



Canadian Fertilizer
Products Forum

Forum Canadien sur
les produits fertilisants

RESEARCH REPORT

OUTCOMES REPORT

Prepared for the
Canadian Fertilizer
Products Forum



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Agriculture and Agri-Food Canada (AAFC) is pleased to participate in the production of this publication. AAFC is committed to working with our industry partners and the Canadian Fertilizer Products Forum to increase public awareness of the importance of the agriculture and agri-food industry to Canada. Opinions expressed in this document are those of the Canadian Fertilizer Products Forum and are not necessarily those of the Department.

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EXECUTIVE SUMMARY

Fertilizers and supplements are the primary determinants of crop yields and soil health. Agricultural producers in Canada spend \$2.6 billion on fertilizers and supplements each year, more than on pesticides, seeds, fuel or any other crop inputs. Current government policies and regulations need improving to better meet the needs of agricultural producers, the fertilizer and supplements industry and other stakeholders in Canada. Increasing attention to food safety and the environment requires better communications regarding the safety and efficacy of fertilizers and supplements to agricultural producers and civil society, including the urban audience.

A number of issues and challenges have been identified by fertilizer and supplements industry stakeholders including:

- ☀ Streamlining the regulatory process
- ☀ Facilitating introduction of innovative products to the Canadian marketplace
- ☀ Maintaining the highest standards for product safety, consumer protection, and environmental sustainability
- ☀ Increasing flexibility of the program to include alternative delivery mechanisms (e.g., third party accreditation, quality assurance programs and industry self-regulation)
- ☀ Increasing transparency, communication, and stakeholder engagement
- ☀ Strengthening marketplace monitoring to provide a level playing field for the industry

In the fall of 2006, with financial support from the Advancing Canadian Agriculture and Agri-Food program, the Canadian Fertilizer Products Forum (CFPF) was formed to create a consultative body that, over two years, would build a national consensus between regulatory agencies, stakeholders and interested parties; and to create a forum for dialogue among all stakeholders, on mutually beneficial processes that protect the public and the environment. The CFPF was charged with promoting a regulatory milieu that encourages innovation, economic sustainability and international leadership for Canada in the field of fertilizers and supplements, and will aim to ensure that the right balance of social, agronomic, environmental and economic objectives is reflected in Canada's fertilizer and supplement regulations.

The more than 330 members of the CFPF represent a broad range of groups from across Canada. Current members include:

- ☀ farm groups
- ☀ industry associations and companies that make and sell fertilizers and supplements
- ☀ consumer and environmental groups
- ☀ municipal, provincial, and federal government representatives

Through the efforts of the Forum's many volunteers and after nearly 80 meetings of the CFPF Executive Committee and its five working groups, many achievements have been realized. Some examples of those achievements include:

1. The awareness and profile of the fertilizer and supplements industry was enhanced through the release of several industry fact sheets including: *Introduction to the CFPF*, *Feeding Your Soil*, and *The Importance of Fertilizers and Supplements*.
2. Several research projects were commissioned:
 - a. Attitudes and Usage of Fertilizers and Supplements – a survey of 300 farmers across Canada
 - b. Emerging Markets and Trends

- c. Voluntary Standards for the Fertilizer and Supplements Industry
 - d. Product Registration
 - e. Marketplace Monitoring
3. Two CFPF National conferences were held in Ottawa in November of 2006 and 2007. A final stakeholder meeting will place on October 15-16, 2008 in Ottawa.
 4. An extensive list of recommendations have been made to the Canadian Food Inspection Agency (CFIA) including recommendations on:
 - f. Efficacy
 - g. T-4-103
 - h. Enforcement regarding non-compliant products
 - i. CFIA service standards
 - j. A path forward for the Canadian Fertilizer Quality Assurance Program
 - k. Fertilizer definitions
 - l. Biosolids discussion document on Waste vs. Product
 5. Established an open, honest, and productive working relationship between stakeholders in the fertilizer and supplements industry and the CFIA Fertilizer Section.
 6. Through effective use of various communications the CFPF delivered an outreach program to the public, media, farm groups, government agencies, NGOs and parties not directly related to fertilizer and supplement products.

The work of the CFPF, as related to ACAAF support for the project, will be completed in the fall of 2008. There is general agreement that the CFPF work is far ahead of the CFIA's capacity to address the outcomes of the working groups. There is also general consensus that a national Forum is needed to keep the momentum going if concrete results from the existing work of the CFPF are to be fully realized.

As a result, it was agreed at the November 2008 Forum that the CFPF Executive will look into options to sustain the momentum of the CFPF. In the interim, CFI will provide for minimum maintenance of the web site, an occasional Executive conference call and organizing a conference for October 2008.

The CFPF has learned many things and can offer some lessons or benchmarks for future projects on public consultation and engagement:

1. Focus on deliverables that are doable
2. Develop a process to keep strong dialogue between the Executive Committee and WGs to reduce overlap and ensure the overall plan is being implemented.
3. Communicate with the members often to keep them engaged
4. Minimize cost – conference calls were the primary medium of communication rather than face-to-face meetings.
5. Use professional facilitation to keep things on track.
6. Compromise is necessary when striving for consensus.
7. See the regulator as a partner not an adversary.

CFPF HISTORY & BACKGROUND

Fertilizers and supplements are primary determinants of crop yields and soil health. Agricultural producers in Canada spend \$2.6 billion on fertilizers and supplements each year, more than on pesticides, seeds, fuel or any other crop inputs. The prosperity of the agriculture and agri-food industry in Canada is dependent on producers' timely access to safe and effective fertilizers and supplements. The current regulatory system has served the industry well by ensuring a science-based and consistent regulatory environment for fertilizers and supplements and by supporting the principles of efficacy and safety for all products. However, current government policies and regulations can be improved to better meet the needs of agricultural producers, industry, and other stakeholders in Canada. Increasing consumer interest and concern over food safety and the environment requires better communications regarding the safety and efficacy of fertilizers and supplements to agricultural producers and civil society, including the urban audience.

In 2006, the Canadian Fertilizer Institute submitted an application to the Advancing Canadian Agriculture and Agri-Food (ACAAF) program to create the Canadian Fertilizer Products Forum (CFPF) over a two-year period. The creation of the CFPF would provide a framework for consultation among diverse stakeholders and facilitate consensus-based advice to government on fertilizer and supplement policy and regulation. The CFPF would also be a vehicle for communication about the fertilizer and supplements industry to the public, media, government, and other audiences.

The decision to create the CFPF was industry-driven and based on months of consultation. In March 2005, consultations with industry, a broad range of stakeholders, and the Canadian Food Inspection Agency (CFIA) were held to gauge the level of interest in working together on regulatory and policy issues. In February 2006, representatives from the fertilizer and supplement industries held two meetings with the CFIA in Montreal and Saskatoon, to discuss issues relating to the regulation of their products. In March 2006, a follow-up industry consultation took place in Ottawa at which time industry stakeholders agreed on the need to create a forum to address regulatory issues.

Common issues and challenges identified by stakeholders during the consultation process included:

- ☀ Reducing regulatory burdens
- ☀ Streamlining the regulatory process
- ☀ Facilitating introduction of innovative products to the Canadian marketplace
- ☀ Maintaining the highest standards for product safety, consumer protection, and environmental sustainability
- ☀ Increasing flexibility of the fertilizer program to include alternative delivery mechanisms (e.g., third party accreditation, quality assurance programs, and industry self-regulation)
- ☀ Increasing transparency, communication, and stakeholder engagement
- ☀ Strengthening marketplace monitoring to provide a level playing field for the industry

This group of stakeholders determined that the purpose of CFPF was to create a consultative body that would build a national consensus between regulatory agencies and stakeholders, and to create a forum for dialogue among stakeholders, on mutually beneficial processes that protect the public and the environment.

The CFPF was charged with promoting a regulatory milieu that encourages innovation, economic sustainability, and international leadership for Canada in the field of fertilizers and supplements, while ensuring that the right balance of social, agronomic, environmental and economic objectives is reflected in Canada's fertilizer and supplement regulations.

OBJECTIVES ESTABLISHED AT OUTSET

The CFPF was created to act as a consultative body to provide the framework for consultation, resulting in strengthened co-ordination among federal departments and agencies, increased transparency, and improved stakeholder engagement in the regulatory process. The mandate of the Forum is to deliver high quality, safe products to market, offering a broad range of solutions to nurture plants and the soil. A comprehensive strategic planning process established the CFPF direction and action plan. (See Appendix A – CFPF Strategic Plan).

CFPF Mandate

The purpose of CFPF is to facilitate consensus-based advice to government and to create a forum for dialogue among stakeholders, on mutually beneficial processes that protect the public and the environment. CFPF promotes a regulatory milieu that encourages innovation, environmental and economic sustainability, and international leadership for Canada in the field of fertilizers and supplements.

CFPF Mission Statement

1. Improve the efficiency of the Canadian regulatory system and policies for fertilizers and supplements to encourage innovation, economic and environmental sustainability, and international leadership;
2. Enhance the reputation of the industry and public confidence in its products via communications to a broad range of stakeholders;
3. Plan for the future by analyzing emerging opportunities, new technologies and strategies on how agricultural producers can remain competitive.

CFPF Vision

Fertilizer and supplement stakeholders have an established framework from which they can participate, provide feedback, and consultation such that the regulatory system is fully modernized and ensures users that fertilizer and supplements in Canada are globally competitive and that users have access to new products in a timely manner.

Based on consultations during 2005 and 2006, the three main activities of the CFPF were determined as follows:

1. **Introduction of New Products** – Many new products such as time-released fertilizers and soil supplements have positive environmental benefits for soil health or minimizing nutrient leaching, while also increasing farm productivity. The Forum explores ways to regulate innovative new technology.
2. **Regulatory Efficiency** – The *Fertilizer Act* governs the sector, and the regulatory framework for fertilizers and supplements requires modernization to meet the growing needs of industry and consumers.

3. **Communicate with Stakeholders** – Products included a CFPPF backgrounder, news releases, key messages, media list, Questions and Answer document on how to register a product, highlights on the importance of fertilizers and supplements, product overviews and material on report findings. Communications tools used included a Forum website, electronic and printed publications, articles in agriculture press, media relations, and national conferences.
4. **Situation Analysis Report:** A review of the Canadian fertilizer and supplement market, regulatory processes and policies, and potential for consensus-based recommendations.
5. **Development of Strategic Plan:** Development of CFPPF's vision, strategies, action plan and timeline.
6. **Opinion research:** Research conducted on farmer fertilizer and supplements use and on public attitudes toward the fertilizer and supplements industry.
7. **Two conferences:** Two national conferences were held in the fall of 2006 and 2007, and a final stakeholder meeting in the fall of 2008.
8. **Four research reports:** Product Registration, Emerging Markets, Industry Standards, and Marketplace Monitoring

THE CFPF TIMELINE

In October 2006, government funding was confirmed by ACAAF and a month later the CFPF was formally launched in Ottawa during the first National Forum. Prior to that time, extensive consultation with stakeholders had been directed by the Fertilizer Section of the Canadian Food Inspection Agency, and was the precursor to the formation of the CFPF. Beginning in March 2006, a volunteer Executive Committee worked with the Canadian Fertilizer Institute to develop the initial plans and funding application for the CFPF. An Executive Committee, which would oversee the activities of the project, was elected during the first CFPF Annual Meeting in November 2006.

The lifespan of CFPF is finite with the project wrapping up fall 2008. Since the November 2006 conference and for a period of two years, stakeholders have been meeting regularly in Working Groups to develop concrete recommendations on complex issues, and research and communications projects have been delivered.

Key milestones that were achieved by the CFPF include:

ACTIVITY	DATE
ACAAF Funding Approved	Fall 2006
First Executive Kick-off Meeting	Fall 2006
CFPF Project Manager and Office established at CFI	Fall 2006
Working Groups Begin	Fall 2006
First National Forum and CFPF Annual Meeting in Ottawa	Nov 2006
Working Groups in full swing	Nov 2006 – Oct 2007
Launch of CFPF brand and web site	May 2007
Ipsos Reid farmer attitude survey	Spring 2007
Spring workshop and project update in Ottawa in conjunction with CFIA meeting	March 2007
Draft Working Group reports submitted	Nov 2007
Second National Forum and CFPF Annual Meeting in Ottawa	Nov 2007
Working Group Final reports submitted in both official languages	Jan – May 2008
Final Research Reports submitted in both official languages	Jan – May 2008
Last ACAAF-funded CFPF Executive Meeting	May 2008
CFPF press release on project outcomes	Fall 2008
Project Completion	Fall 2008

WHO PARTICIPATES IN THE CFPF?

The CFPF membership is national in scope, representing a range of stakeholders from across Canada with regional perspectives. Membership of the CFPF is open and includes representation from any group, organization, or individual that has a stake in the fertilizer and supplement sector. Several international members from the U.S. and Europe have been active participants in CFPF working groups, bringing additional insight into the work of the Forum. Current members include:

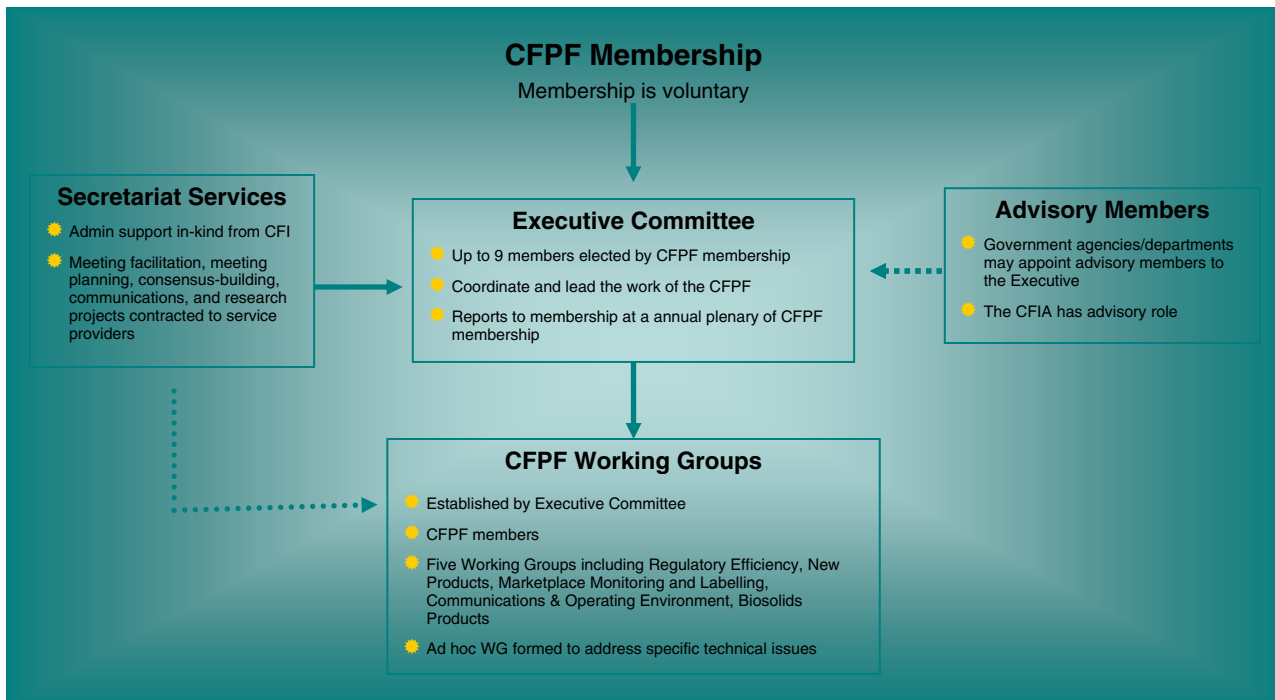
- ☀ farm groups
- ☀ industry associations and companies that make and sell fertilizers and supplements
- ☀ consumer and environmental groups
- ☀ municipal, provincial, and federal government representatives

Specific organizations represented at the CFPF include:

- ☀ Canadian Federation of Agriculture
- ☀ Canadian Association of Agri-Retailers
- ☀ Canadian Biosolids Partnership
- ☀ Canadian Cattlemen Association
- ☀ Canadian Fertilizer Institute
- ☀ Canadian Water and Wastewater Association
- ☀ Consumer groups
- ☀ Grain Growers of Canada
- ☀ Alberta Barley Commission
- ☀ Lawn and Garden groups
- ☀ Micronutrient Fertilizer Association of Canada
- ☀ Compost Council of Canada
- ☀ Environmental groups
- ☀ National Farmers' Union
- ☀ Ontario Agri-Business Association
- ☀ Plant Inoculants Canada
- ☀ Regional crop groups

The current voluntary membership numbers approximately 330 individuals. See Appendix B for the membership list.

The CFPF is a member-driven organization. The membership elected an Executive Committee to oversee the work of the CFPF during its tenure. The general structure is as follows:



WORKING GROUP REPORTS

The CFPPF established Working Groups (WG) with broad cross-sectoral mandates to build the foundation for on-going dialogue and discussion on relevant regulatory issues. The objective of each WG is to develop consensus-based recommendations to government on a broad range of regulatory issues.

The following WGs were formed:

- ☀ Regulatory Efficiency Working Group
- ☀ Marketplace Monitoring Working Group – two sub-committees were formed including Canadian Fertilizer Quality Assurance Program Sub-committee and the Labelling Sub-committee
- ☀ New Products Working Group/ Efficacy Task Force
- ☀ Communications and Operating Environment Working Group
- ☀ Biosolids Products Working Group

Participation in WG was voluntary and not mutually exclusive, with one Executive Committee member participating on each WG. The total number of participants in all WGs was 188 individuals. For a listing of WG members by WG and Sub-committee, see Appendix C. The size of each WG is shown below:

Working Group Members	Number of Participants
Marketplace Monitoring & Labelling WG	28
CFQAP Sub-committee of MMLWG	35
Labelling Sub-committee of MMLWG	16
Regulatory Efficiency WG	35
Communications and Operating Environment WG	8
New Products WG (suspended for work by Efficacy Task Force)	18
Efficacy Task Force	26
Biosolids Products WG	22

WGs met as frequently as deemed necessary by members, most often via conference call. A schedule of meetings for the Executive Committee and all WGs was regularly updated and circulated to the CFPPF membership. In addition, members were notified of upcoming meetings through regular Member Updates.

The agenda and minutes were circulated for each WG meeting. Each WG presented their interim report, including recommendations, to the Executive Committee and CFPPF plenary at the November 2007 conference. Input from members resulted in the revised Final Working Group Reports, which can be found on the CFPPF web site: <http://cfpf-fcpf.ca>

The volunteer contribution of CFPPF WG members was extensive. From fall 2006 to spring 2008 there were a total of 65 WG meetings and 13 Executive meetings, totaling 78 meetings. In addition, members participated in two national forums in Ottawa. See the table below for a breakdown by committee.

Working Group/Committee Meetings	Number of Meetings
Executive	13
Marketplace Monitoring & Labelling WG	9
CFQAP Sub-committee of MMLWG	6
Labelling Sub-committee of MMLWG	9
Regulatory Efficiency WG	11
Communications and Operating Environment WG	8
New Products WG/Efficacy Task Force	7
Biosolids Products WG	15
TOTAL	78

Regulatory Efficiency Working Group (REWG)

The REWG set out to achieve a number of objectives, including

1. Broad based improvement in efficiency of the regulatory process for fertilizers & supplements
2. Review efficacy data requirements
3. Process for tracking status of applications
4. Baseline study of economic impacts of current regulatory framework
5. Events/training on regulation
6. Develop standards for acceptability of industry research
7. Improve consistency (national) of CFIA responses
8. Non-traditional products / combinations
9. Conditional registration

REWG Issues and Recommendations

During the period November 2006 to October 2007 the REWG considered a number of issues.

1. Efficacy Data Requirements

A task team was struck to deal with the issue of efficacy data requirements but during the very first meeting it became clear that the efficacy data issue was both broad and deep, and that it would not be resolved quickly. As a result, the Efficacy Task Force was established in December 2007 and combined with the New Products WG. New Product WG efforts were therefore put on hold.

2. Research Application Tracking System

- ☀ The REWG addressed the need for an efficient research application tracking system to be employed by CFIA. This need arose from the frustration created by the uncertainty of obtaining research approval for new products and formulations in time for the upcoming planting season. When the REWG approached the Regulator on this issue, CFIA asked that the WG help to address the bigger issue of an overall structure of the research application/approval process. This led to a comprehensive review and revision of Trade Memorandum T-4-103, which governs the process by which new products and formulation are tested in the field.

Specific recommendations made the REWG include:

- ☀ That CFIA adopt a 90-day service standard for application results.
- ☀ That field trial maps be submitted no later than 21 days after planting. The CFPPF acknowledges that a 14-day submission period would be ideal and proponents should be encouraged to fax, mail or e-mail maps to CFIA within that period.
- ☀ That the use of GPS technology to locate the corner points of field trial plots be phased in over a three year period by allowing the continued use of the existing process during that time.

Ultimately the work of the REWG resulted directly in amendments to the application system, categorization of research authorizations, service delivery standards, and mapping requirements. REWG members cited T-4-103 as one of their biggest achievements over the year.

3. Assess Economic Impact of Regulatory Framework

The WG's third priority was to baseline the economic impacts of the current regulatory framework. The WG provided input into the development of an economic impact study prepared by the George Morris Centre. Upon the encouragement of REWG, the Centre included additional interviews from the micronutrient and inoculants industries and were able to include this information within the scope of their study.

4. Training for Industry

The fourth element in the work plan was training for industry to help them operate effectively and efficiently within a complex and changing regulatory environment. To this end, REWG developed a proposal to CFIA for on-going, "for cost" training delivered by CFIA staff, which would help industry understand the complex regulatory framework and allow companies to operate more effectively within that framework. Specific recommendations were provided to conduct training on submission preparation, which was hoped to reduce the amount of incomplete or improperly completed application forms that are submitted to CFIA.

CFIA agreed in principle that "for cost" comprehensive regulatory training would be an appropriate measure however, the Regulator believes that development of a comprehensive package of training products can only be developed once all elements of the framework have been reviewed and updated.

CFIA did however host a Mid-Year Workshop on the Fertilizer Program Modernization in conjunction with the CFPPF Forum in November 2007. The event consisted of two half-day sessions: a progress update and discussion session on alternative delivery models; and research authorizations and the new T-4-103 process.

5. Other Items

During the tenure of the WG, several items on the work plan were displaced by new and more pressing issues. These include:

a. The Micronutrient Fertilizer Association of Canada (MFAC) approached REWG to comment on a position paper they had drafted and were intending to submit to CFIA, proposing amendments to the testing requirements to certify the safety of heavy metals and guaranteed nutrient testing.

b. CFIA approached the REWG to comment on a set of draft service standards that were under development at the Agency.

Specific recommendations provided by the WG include:

- ☀ Premature timing to release Appendices A and B
- ☀ Timeline commitments by CFIA to review submissions are too loose
- ☀ Clearing the backlog of submissions as part of standard implementation
- ☀ The need to commit to process streamlining
- ☀ The need for full consultation and impact assessment on the final wording of the eventual Trade memorandum on Service Standards
- ☀ Removal of the “full staffing” condition for the standards to be applied

c. The REWG was asked by CFIA to comment on their work plan for modernization of the regulatory framework.

d. The REWG also developed recommendations to streamline re-registration for currently registered products and their labels.

Marketplace Monitoring & Labelling (MMLWG)

The MMLWG is a permanent WG of CFPPF. Its purpose is to discuss systems to oversee quality programs for the fertilizer and supplements sector. It also explored the role and mechanisms for labeling and proposed methods for improvement. Specific issues that the WG discussed include:

1. Sector specific quality assurance and options for a system for marketplace monitoring
2. Improve alignment of enforcement resources for unregistered products
3. Labeling standards and processes, including possibly conducting market research on labeling
4. Upgrade *Schedule IIA* and define key words
5. State of the Canadian Fertilizer Quality Assurance Program (CFQP)

To focus efforts of the WG, two sub-committees were formed. The Labeling Sub-committee was tasked with developing recommendation on upgrading *Schedule IIA* while the CFQAP Sub-committee was charged with addressing the weaknesses of this existing quality assurance program for bulk-blended fertilizers.

The WG also dedicated time to discussing the new Organic Regulations and how they interact with the *Fertilizer Act* and *Fertilizer Regulations*. A diversity of opinion exists and consensus could not be reached on which regulations should take precedence. A response to CFIA was drafted but it was agreed that individual members would pursue their own positions and the CFPF would remain neutral on the issue.

MMLWG Issues and Recommendations

3. Quality Assurance

Early in the process, the WG learned about different quality assurance systems. Presentations by the Canadian Seed Institute and the Compost Council of Canada offered different models of how to conduct quality assurance.

Options were identified on how to conduct quality assurance for a range of products. Many sectors are pleased with the existing mechanisms for quality assurance, including specifically supplements and inoculants. It was agreed in future that a product-by-product review be made of quality assurance systems but that no single macro-system was appropriate to cover quality assurance for the industry. Options are included in the final MMLWG report.

1. Enforcement

Members of the CFPF report there are recurring and sizeable problems with unregistered, improperly labeled, or illegally repackaged fertilizer and supplements being sold, particularly in the lawn and garden market. The situation remains largely unresolved, resulting in potentially dangerous situations for consumers and the environment, plus an uneven playing field harming companies that invest in complying with CFIA standards.

The WG commended CFIA for highlighting the importance of enforcement in its strategic plan and its new education program for enforcement officers but recommended additional action be taken by CFIA, including:

1. Send a letter to lawn and garden retailers on current regulations.
2. Implement an enforcement monitoring program to follow up the letter.
3. Send out a release advising retailers about unregistered products.
4. Post a list of registered products on the CFIA web site.
5. Alert CFIA enforcement officers of problem products and train them with case studies.
6. Allow CFIA officers to go directly to source rather than retail.
7. Focus enforcement on problem sectors.

The WG itself prepared an article on fertilizer and supplement products and circulated it to industry journals in the lawn, garden, and nursery trades. It also identified key industry events for CFIA to attend and participated in a knowledge session with the CFIA and the Ontario Agri Business Association (OABA) Lawn & Garden committee where industry provided concrete examples of infractions.

2. Labeling Standards and Processes

The MMLWG undertook an internal labeling survey to direct its discussion and recommendations pertaining to labeling. Key issues related to the labeling of fertilizer and supplement products that are considered most important by industry include:

- **Achieving clarity through manuals, guidelines, and training programs** – CFIA could offer greater clarity about what it requires on labels by creating manuals and guidelines.
- **Inconsistencies in label review** – Industry experience indicates that, with staff turnover and differences in interpretation, there is a lack of consistency in how staff review labels.
- **Updating delivery standards** – Industry is extremely concerned about the 2-3 year backlog for label review. Service delivery standards for registration and re-registration should be updated.
- **Regulate text not artwork** – CFIA should regulate the text of the label rather than the artwork, similar to the Pest Management Regulatory Agency (PMRA). More information on this topic can be found in the *Product Registration Report* available on the CFPF web site.
- **Simplify re-registration process** - When it comes to product re-registration, if registrants are not requesting changes to labels and there have been no regulatory or policy changes that would result in a required label change, industry suggests no label review.
- **List text of registered products on CFIA web site** - This would be helpful for retailers and manufacturers and it would allow the public, including retailers, to validate if a product is compliant/registered.

3. Upgrade Schedule IIA and define key words

The Labeling Sub-committee conducted an extensive review of definitions included in Schedule IIA and in the Association of American Plant Food Control Officials (AAPFCO) guidelines. The sub-committee made more than 40 recommendations for inclusion, which are included in the final WG report.

4. What to do with the Canadian Fertilizer Quality Assurance Program

The CFQAP was developed as a voluntary QA program for bulk blend fertilizer facilities, and participants include nearly 1,200 bulk blend fertilizer facilities in Canada. The CFQAP sub-committee reviewed legislative and regulatory requirements as well as CFIA's reports on program compliance and participation in CFQAP. The sub-committee made the following recommendations:

- **Report Card/Grading System** - The current CFQAP report card does little to create value and it should be replaced with a pass/fail system.
- **Testing Protocols** – Benefits of switching from the current solubles test to a test that measures totals include: the test is faster, less sensitive to moisture, and less costly.
- **Sampling Training** - An education program should be developed in cooperation with Ontario Agri Business Association, Canadian Association of Agri-Retailers, Atlantic Fertilizer Institute, the CFIA, and other appropriate stakeholders.

- **Deficiency Levels for Fertilizers** – There should be a reassessment of the calculation of tolerances using a Horowitz standard deviation.
- **A Quality Monitoring System for Bulk-Blended Fertilizers** - The sub-committee recommends a “twin-track” approach to monitoring and assuring fertilizer quality at the retail level – a “testing protocol” and a “blending protocol”. Retailers could choose either track based on their individual circumstances.

New Products Working Group (NPWG)

The NPWG was established to:

- Review processes to register new products with CFIA
- Establish priorities for new products, including the need for efficacy
- Examine Canada’s place in international competitiveness

There was a strong and consistent message at both Forums that Canada is falling behind in access to new products. These newer products offer improved yields with lower risks to the end, and in some cases improvement to soil and plant health. Many of these products are available to farmers, horticulturalists, and gardeners in other jurisdictions. The serious impediments to introducing competitive products must be addressed.

At the CFPF Forum in November 2006, issues concerning efficacy testing were brought to the forefront as the biggest single impediment to the introduction of new products. Thus the work of the NPWG was suspended in favor of the Efficacy Task Force.

Efficacy Task Force

The inputs industry and farm groups alike have identified a need to increase access to new fertilizer and supplement products. Canada is falling behind in new technology that offers environmental and productivity benefits and existing efficacy rules are seen as the primary impediment to national competitiveness in this area.

The mandate of the Task Force was not to resolve the need for efficacy testing on any specific product or group of products. Rather, the Task Force was asked to provide recommendations on how to more efficiently conduct efficacy testing for any products that require the submission of efficacy data as prescribed under the *Fertilizers Act* and *Regulations*.

Issues considered by the Task Force include:

- What triggers efficacy
- Acceptance of private and international data
- Role of Schedule II in exempting products from efficacy testing
- Standards of significance
- Greenhouse trials
- Efficacy requirements for micronutrients
- Tax credit policies

Efficacy Task Force Issues and Recommendations

1. Triggering Efficacy

To avoid redundant testing, it was recommended that full efficacy data only be required when there is a new active ingredient, a major new claim for an active, or a combination of fertilizer with a pest control product. Bridging data requirements would be required for changes in formulations. These rules would apply only to those product categories subject to efficacy testing.

2. Number of Trails and Standards of Significance

The details of this recommendation include number of field trials required; the amount of trials that must be conducted in Canada; number of field trials to expand existing registration to a new region; confidence interval for data analysis; and allowance for secondary or soft claims (see Efficacy Task Force report for details).

3. Requirements for Greenhouse/Growth Chamber Data

The Task Force presented specific recommendations on how greenhouse and growth chamber trialing data can be incorporated into research data for efficacy purposes. In the case of growth chambers, data is meant to supplement field data, not replace the need for replicated field trials. Since environmental conditions can be variable, field testing sometimes results in statistically non-significant data. In these cases, it would be appropriate to supplement this data with growth chamber results.

4. Efficacy Guidelines for Micronutrients

Micronutrients were the only product-specific recommendations made by the Task Force and much of the final recommendation flows from work undertaken by the Micronutrient Fertilizer Association of Canada. The main points addressed of the recommendations include:

- Micronutrients which are below 40% water solubility should require efficacy testing.
- Requirement for 6 station years of data for all products, with these trials, being performed in a controlled environment (greenhouse/glasshouse)
- Requirement for 4 out of 6 trials to show that the proposed treatment performs better than an untreated check, at a 90% standard of significance.

Biosolids Products Working Group (BPWG)

The Biosolids group was established to review and discuss issues related to product quality, quality management systems, product safety, regulatory efficiency and the need for harmonization of federal-provincial standards, uniformity and efficacy requirements, labeling and monitoring requirements, and registration; all as specifically related to the regulation of biosolids based fertilizers, supplements and composts under the *Fertilizers Act*.

The Biosolids Work Group identified three issues that were of highest importance to the group including:

1. Quality Assurance and Quality Control Information Requirements
2. Registration and Efficacy Requirements
3. Policies and Standards Harmonization

BPQG Issues and Recommendations

DEFINITION OF BIOSOLIDS

Some members would like to replace the Designated (product) Name "Processed sewage" in *Schedule II* of the *Fertilizers Act* and *Regulations* with the name "Municipal biosolids" while other members of the subgroup are content with the present terminology of *Schedule II*. The two suggested definitions are shown below:

Municipal Biosolids – are the end product, predominantly organic in nature, resulting from treatment of municipal wastewater and septic system waste to a level that meets federal and provincial regulatory requirements for beneficial use.

Processed sewage (Specify grade) – Products made from sewage, freed from grit and coarse solids, that are dried, ground and screened.

For the purposes of the CFPF and CFIA the term “municipal biosolids” is suggested as more currently relevant than the term “processed sewage.” While this is the majority view point, it is important to note that a minority does not support changing the definition.

WASTE VERSUS PRODUCT

A Waste vs. Product sub-committee was developed to respond to concerns expressed by Ontario members that there are specific and unique circumstances as well as requirements in place under Ontario provincial legislation that make it difficult to shift or reclassify a provincially regulated waste material such as pelletized biosolids (further processed sewage biosolids) to a non-provincially regulated product. It is thought that similar circumstances and/or requirements may also be present in other provincial jurisdictions in Canada and thus may be of national significance when considering possible changes that would improve the cross-Canada application of the *Fertilizers Act* and *Regulations*.

The WG developed a discussion document for consideration by CFIA. The document received comment from CFIA and the Ontario Ministry of Environment. Specific recommendations of the majority BPWG include:

1. The provinces should not rely on federal legislation to regulate the land application of waste materials that may be contentious or where the potential for improper spreading may pose unacceptable risks to food safety or the environment, but consider companion legislation to regulate use and land application.
2. The regulatory agencies charged with deciding whether there has been a sale should establish harmonized minimum requirements and standards as to what constitutes a legitimate sale transaction, and this information should be made public.
3. The decision as to whether there has been a legitimate sale transaction should not be co-dependent on whether there is legitimate market demand.
4. Consideration should be given to replacing the voluntary process of seeking a “Letter of No Objection to Sale” with a requirement that waste-based or derived materials must undergo registration or a product review under the *Fertilizers Act* and *Regulations* if they are to be applied to land as a fertilizer or supplement product.
5. The mandatory registration or product review process described in point # 4 needs to be more open, transparent, and cooperative.
6. There is a need to maintain information as proprietary and confidential, however this should not be a barrier to provide public assurance that a waste material has been assessed for safety.

A minority viewpoint is also included in the final recommendations, which includes concerns for:

- Lack of Federal-Provincial communication
- Lessening of provincial regulatory control
- What constitutes a legitimate ‘sale’ transaction under the *Fertilizers Act*?
- No requirements for ‘market demand’ for a fertilizer or supplement.
- Reliance on analytical results provided by the proponent.

Specific minority viewpoint recommendations include:

1. Requirement for the registration of all sewage, sludge-based, or derived materials (regardless of legitimate sale) that are marketed to consumers as a fertilizer or supplement.
2. The provinces should retain regulatory control over the land application of sewage, sludge-based, or derived fertilizer or supplement products to ensure the application rate is safe, sustainable, and appropriate for the intended use.
3. Create a public education program to improve public knowledge and understanding about the regulation of these fertilizer and supplement products and for proponents to understand their obligations under both provincial and federal regulations.
4. CFIA should publicly release the names of non-compliant contaminated fertilizers and supplements, similar to food pathogen requirements.

CROSS-CANADA PROVINCIAL BIOSOLIDS REGULATIONS SUBGROUP

The Cross-Canada Provincial Biosolids Regulations Subgroup was tasked with identifying a summary of nutrient, pathogen, inorganics, and organics limits in Canadian regulatory instruments for wastewater sludge beneficial re-use. An initial document was tabled at the WG but final recommendations were not reached.

COMMUNICATION AND INDUSTRY OUTREACH

Outreach to the public was the responsibility of the Communications and Operating Environment Working Group (COEWG). The COEWG was established to achieve a number of objectives including:

- To communicate effectively regarding the role of the CFPPF and the benefits and safety of fertilizers and supplement products
- To provide strategic direction to the communications activities of the CFPPF
- Review communications products produced for the CFPPF to ensure consistency with the CFPPF's key messages, prior to final approval by the Executive Committee
- Support the internal communication needs of the CFPPF members, especially participants in other WGs

COEWG had successful outreach with the public, media, farm groups, government agencies, NGOs and industry not directly related to fertilizer and supplement products. The WG was instrumental in sharing extensive information about the CFPPF through press releases and the CFPPF web site, which was spearheaded by the COEWG and formally launched in May 2007. To prepare for outreach with the public, the COEWG collaborated with the CFPPF Executive to develop a set of key messages that would be the focal point for proactive communications throughout the life of the CFPPF.

Externally focused communication activities that were undertaken by the CFPPF and the COEWG included:

1. A comprehensive media contact list was developed in October 2007
2. A press release and backgrounder on the CFPPF Ipsos Reid survey was issued in October 2007. In addition, information on the Ipsos Reid survey and the CFPPF was covered in the farm media articles including: *Western Producer*, *Grainews*, *Fertilizer Week America*, *Barley Country* and *Beef Magazine*.
3. A full-page story on the CFPPF was included in the fall 2006 issue of the *CAAR Communicator*, the trade publication for Canadian agri-retailers. Four additional stories were also run over the project duration. (See Appendix D)
4. The COEWG was instrumental in developing the logo and brand identity for the CFPPF.
5. Industry fact sheets were developed including: *Introduction to the CFPPF*, *Feeding Your Soil*, and *The Importance of Fertilizers and Supplements*. Copies of the fact sheets were distributed to provincial and federal Ministries of Agriculture across Canada. In addition, the fact sheets are posted on the CFPPF web site as resource materials.
6. The results of the CFPPF Ipsos Reid survey were distributed to farm groups across Canada in October 2007, including the Canadian Federation of Agriculture, Christian Farmers Federation of Ontario, Alberta Pulse Growers, Manitoba Pulse Growers, Saskatchewan Pulse Growers, Alberta Barley Growers and the Grain Growers of Canada. Highlights of the survey were also sent to the networks of the Association of American Plant Food Control Officials, the Canadian Fertilizer Institute, The Fertilizer Institute in the United States and the Canadian Food Inspection Agency.
7. The COEWG ensured a comprehensive member data base was maintained throughout the CFPPF. That data base exists as the main mechanism for outreach to the entire CFPPF membership.
8. A CFPPF banner stand was developed to raise visibility of the CFPPF at conferences.
9. A Question & Answer document was produced to explain how to register a product with the CFIA in April 2008.

10. Three communications publications were produced based on the research reports on industry standards, emerging markets, and marketplace monitoring.
11. A final Outcomes Report was produced outlining specific deliverables and results.
12. A letter was sent to provincial and federal Ministers of Agriculture with the Outcomes Report summarizing the achievements of the CFPF.
13. A news release summarizing the achievements of the CFPF was produced and distributed.

COWEG was successful in supporting internal communication for the CFPF. Their work in establishing common operating and reporting procedures made the work of the CFPF more fluid and effective. Internally focused communication activities that were undertaken by the CFPF included:

1. The WG established a means to regularly communicate with CFPF members. Regular Member Updates and news bulletins were distributed by e-mail to the entire CFPF membership. These updates included highlights of Executive Committee and working group activities, notices of upcoming events and meetings, and highlights of commissioned reports. See Appendix E for an example. In addition, special “Save the Date” and “National Forum Notices” were e-mailed to all CFPF members advising them of national CFPF events.
2. Early on in the CFPF, the COEWG developed a “Calendar of Events”, which outlined all planned WG and Executive meetings. The calendar was updated regularly to ensure there were no conflicting meetings as well as to keep members advised of upcoming meetings through the Member Updates.
3. COEWG established a formal process for communication across the entire CFPF, including templates for meeting agendas and minutes. See Appendix F for an example
4. Individuals were encouraged to participate in the activities of the CFPF WG. Contact information for each WG Secretariat was provided via Member Updates and the web site.
5. A fertilizer and supplement industry *Situational Analysis* was contracted and used as resource information for members. The document is posted on the CFPF web site.
6. The CFPF established a clear point of contact with the CFPF:

CFPF Office
Canadian Fertilizer Products Forum
c/o Canadian Fertilizer Institute
350 Sparks Street, Suite 802
Ottawa, ON K1R 7S8
E-mail: info@cfpf-fcpf.ca

KEY EVENTS OF THE CFPF

The CFPF held two key events during its tenure. The first CFPF National Forum was held in Ottawa November 28 and 29, 2006. The second CFPF National Forum was also held in Ottawa November 26 and 27, 2007. A final meeting will be held in October 2008.

First National Forum

Over 80 individuals attended the first National CFPF Forum in Ottawa. The focus of the conference was to bring together CFPF members to discuss issues of importance, move forward on some key issues, share ideas, innovations and suggestions, and receive a report from regulatory agencies on regulatory progress. In addition, the conference held the first Annual General Meeting of the CFPF where an Executive Committee of the CFPF was elected by industry.

During the meeting, several key issues came to the forefront that would frame the future work of the CFPF. These included:

1. It became evident that improving efficacy regulation is one of the top priorities of the Forum. There was general agreement to create a Task Force solely focused on the issue and to focus on the immediate steps that can be taken to improve efficacy regulation so it does not continue to be a deterrent to new products. This issue and the creation of a Biosolids Work Group were referred to the Executive.
2. For the most part, people thought the issues already identified by the CFPF and assigned to a WG were correct. The need to focus on biosolids and efficacy was stressed.
3. The expectations for rapid change – especially regarding regulatory overhauls, may be overly ambitious. CFIA needs to consider the resource implications for delivery on their items. Expectations are high, as is the appetite for change.
4. Concern there is no federal oversight for biosolids and there are a number of provincial regulations. In addition, there is a disconnect between when a product is regulated if it is applied to land but not sold for cash.
5. There needs to be more focus on creating a level playing field through better enforcement of unregistered products. The issue of posting labels on the CFIA web site was addressed.
6. More communication from CFIA. Need to solidify cooperative efforts to attain short term/urgent goals.

Main conclusions that were drawn from the meeting included:

1. Most members were quite impressed by the considerable effort WGs had put in. “From what I hear and see, the work groups seem to be working well,” said one participant.
2. CFIA’s involvement is necessary and highly cooperative. There is great appreciation for the work CFIA has done on this project and their willingness to come to the table. A proactive role by CFIA is needed: they have the resources and knowledge and CFPF needs to tap into this. CFIA are very useful in identifying limitations imposed by regulatory structure; ie what actually can and can’t be done, as well as resource issues.

3. The group considered their satisfaction with the process and work completed to date, by rating on a scale of 1-10 (with 10 being very satisfied, and 1 being not satisfied). Participants indicated a high level of satisfaction with the process and work of CFPPF to date – with no responses recorded below a number “7”, and the majority of responses ranking an “8” or “9”.
4. There is broad based consensus that the CFIA Strategic Action Plan and Work Group plans are sound but the ‘proof is in the pudding’. It is important that work get accomplished and progress is made. The goal is to have concrete items to report on and review (possibly approve) at the next Forum meeting.

Second National Forum Summary

Approximately 90 individuals attended the second National CFPPF Forum in Ottawa. The main focal points of this National Forum was to obtain membership feedback on the draft reports and recommendations of the CFPPF WGs, to learn about the findings of various research projects being undertaken by the CFIA, to receive an update on regulatory progress made by the CFIA, and to explore the future for the CFPPF.

Details of the meeting, including all presentations and the Forum Report, can be found on the CFPPF website.

Key results from the National meeting included:

1. There was general agreement that the CFPPF work is far ahead of the CFIA’s capacity to address the outcomes of the WGs. A Special Motion was passed to address the resourcing shortage at the CFIA Fertilizer Section. General discussion focused on the fact that the CFPPF could not achieve its goals without progress on the issues by the CFIA. This was a repeated theme throughout the Forum.
2. There was general consensus that a national Forum of some type is needed to keep the momentum going but that continued participation by members would be contingent on concrete results and implementation of the recommendations.
3. Members of the CFPPF expressed strong support for the work and recommendations of the five working groups. With the inclusion of several important additions or changes provided during the Forum, the WG reports were agreed and the WG chairs were directed to submit their reports as final.
4. CFPPF members believe that the work of the CFPPF has been relevant, effective in addressing issues, and overall successful. Attendees were asked to comment on the success of the CFPPF through an anonymous survey. Their responses included:
 - Level of Accomplishment of CFPPF to date - 73% of respondents rated the level of accomplishment of the CFPPF at a 7 or greater. (1=low and 10=high)
 - Effectiveness of CFPPF as a Forum for addressing issues - 86% of respondents rated the level of effectiveness a 7 or greater.
 - Success of CFPPF as a project - 85% of respondents rated the level of success at a 7 or greater.

COMMISSIONED REPORTS

The CFPPF commissioned a number of research reports that addressed issues of specific interest and importance to the fertilizer and supplements industry. These reports include:

1. Attitudes and Usage of Fertilizers and Supplements
2. Emerging Markets and Trends
3. Voluntary Standards for the Fertilizer and Supplements Industry
4. Product Registration
5. Marketplace Monitoring

Final English and French versions of the reports are posted to the web site.

Attitudes and Usage of Fertilizers and Supplements

In spring of 2007, Ipsos Reid conducted a telephone survey of 400 producers across Canada on behalf of the Canadian Fertilizer Products Forum (CFPPF). The main purpose of the study was to gain a better understanding of Canadian producers' familiarity, usage and attitudes toward fertilizer and supplement products. A summary of the survey findings is presented below.

Familiarity with Fertilizers and Supplements

- Close to nine in ten growers nationally apply fertilizer or supplements.
- Those with farm sales of less than \$100,000 are less likely to apply fertilizer than their peers.
- Nationally, less than a tenth of farms have certified organic production, with the highest being in Quebec (10%) and the lowest in Ontario (1%).
- Producers have a high level of familiarity with conventional fertilizers (nitrogen, phosphate, potassium and sulphur).
- Less than half of producers are familiar with wetting agents and bio-solids.

Product Usage

- Producers typically use several fertilizer products and supplements – only 2% have not used any in the past 3 years, and close to half have used six different products or more.
- The main reason for using most fertilizers and supplements is to maximize yields.
- The main reason for not using various fertilizers and supplements is that they feel they are not needed, or they are not available.
- The vast majority of those using conventional fertilizers (N, P, K, S) use them yearly. This is also the case with inoculants and manure.

Attitudes Toward Fertilizers and Supplements

- Producers generally think that the public's perception of fertilizers and supplements is 'neutral' to positive.
- Public perception has had limited impact on use of fertilizers and supplements

Future Use of Fertilizer and Supplements

- 25% of nitrogen users plan to make a change in their nitrogen use pattern in the next 3 years – 80% plan to decrease use.
- 20% of phosphate users plan to change their use in the next 3 years with 90% of those planning to decrease use.
- Products most likely to increase in use include compost, potash and micronutrients.
- Products least likely to increase in use include nitrogen and phosphate, inoculants and wetting agents
- The main reasons for increasing use are to maximize yields (nitrogen, micronutrients, slow release fertilizers) and to save money (compost and manure).
- The main reason for decreasing the use of most products is concern about cost.

Quality of Products

- The vast majority of growers are satisfied with the physical quality of fertilizers and supplements when they receive them
- About a tenth of growers nationally have complained or returned product in the past five years mostly due to lumpy and dusty product.
- The products most likely to have been the source of the complaint or having to be returned were nitrogen (47% of those who had concerns), followed by phosphate (23%) and potassium (17%).
- Overall, over nine in ten growers are satisfied with the way their fertilizer is blended.

Regulatory Oversight

- About six in ten growers nationally are at least somewhat aware that the CFIA has standards in place for the quality and safety of fertilizers and supplements sold in Canada.
- Three-quarters of growers nationally feel that the CFIA does a good job of regulating fertilizers and supplements to ensure they are safe and effective.

Emerging Markets and Trends

This research report by the George Morris Centre was commissioned to identify and assess emerging domestic and international market opportunities and trends for the Canadian fertilizer and supplement industries. Understanding these opportunities will help the industries to maintain or improve their competitiveness and meet the needs of agricultural producers in Canada and around the world.

Over the next five years, world fertilizer demand is projected to grow steadily. Global demand for the primary macronutrients (N,P,K) is expected to increase by 2.6% per year on average primarily due to growth in Asia. Expert opinion suggests that the growth rate of demand for micronutrients is approximately double that of macronutrients (i.e. 4-5%). Nutrient deficiencies within soils are driving this growth. Anecdotal evidence indicates a trend toward greater use of supplements, primarily driven by concern for the environment and increases in organic production.

Overall, there appears to be four main drivers of growth for fertilizers and supplements: biofuels; food and nutrition security; environmental concerns; and organic production.

- **Biofuels** – The movement towards biofuels is resulting in higher commodity prices and increased crop production thereby creating increased demand for fertilizers and supplements as a whole. Brazil and parts of Southeast Asia present some opportunities for increasing fertilizer exports due to biofuels.
- **Food & Nutrition Security** – Nutrient deficient soils in Africa and Asia are limiting food production in those regions and domestic governments are making commitments to increase adoption of fertilizers. Slow, long-term growth is an opportunity for Canadian suppliers of fertilizer products.
- **Environment** – In Asia, there is a very large market for enhanced efficiency fertilizers to address environmental issues and respond to future environmental legislation. In North America, there are increasing opportunities for enhanced efficiency fertilizers, organic fertilizers and supplements, and “green products” in response to regulation and increasing demand for products which reduce environmental impacts. Environmental remediation also requires compost, organic fertilizers and potentially biosolids in order to restore organic matter.
- **Organic** – Growth in organic food sales and organic agriculture within Canada and the United States is creating opportunities for compost, organic fertilizers and organic matter.

In order to take advantage of emerging opportunities, the industry needs to be willing to change and invest in research and development. As well, industry stakeholders need to be ready to anticipate new opportunities and respond with products that suit the needs of users. The role of government should be providing support including: investment, innovation, research and development, effective regulation, intellectual property rights protection, and export programs to help companies understand potential markets and establish relationships.

Voluntary Standards for the Fertilizer and Supplements Industry

Monachus Consulting was contracted by the CFPPF to review the relevance and application of voluntary standards on the fertilizer and supplement industries and to assess the relevance of existing quality programs for the fertilizer and supplements industry in Canada. A number of Canadian programs were reviewed, including:

- The Fertilizer Quality Assurance Program, a voluntary program operated by the CFIA
- The Ammonia Standards Program established under the Fertilizer Safety & Security Council
- Canadian compost standards
- Canadian Seed Institute
- Canadian Cattle Identification Program

The consultants also assessed the relevance of a number of international quality programs and standards, including:

- International Organization for Standardization (ISO) and Hazard Analysis and Critical Control Point (HACCP)
- Fertmark from New Zealand and Fertcare from Australia
- U.S. Compost Council standards
- Standards established by the U.S. Fertilizer Institute and the EU Fertilizer Manufacturers’ Association
- UK Fertilizer Industries Assurance Scheme

- Norwegian Water and Wastewater Works Association Quality Assurance

The report concluded that certification programs in the fertilizer and supplements sector are an emerging trend and that the key drivers of existing and future programs will be quality demands of the customer, food safety, security related to terrorism, traceability, and regulatory requirements.

Marketplace Monitoring

Throughout various meetings and industry consultations the notion of a formal, industry-recognized system for marketplace monitoring was brought forward and the need for additional research and recommendations on a path forward was identified. The research is a compilation of research and analysis gathered by Issues & Insights during the past two years of work related to marketplace monitoring.

Several factors have led to industry's consideration for a marketplace monitoring program, including increasing costs for existing CFIA monitoring, opportunity to create value to businesses and customers, poor performance of existing programs, and the need for CFIA inspectors to focus more effort on enforcement.

A number of existing quality monitoring programs were researched including both mandatory and voluntary programs, as well as programs operated by industry and programs operated by government. As a result of the findings, a number of options for a quality-monitoring program for fertilizers and supplements were outlined, including:

- Government-run inspection
- Self monitoring
- Private industry body does accreditation
- Monitor only at point-of-sale
- Monitor only at point of manufacture
- Drop inspection and let market decide

Product Registration

Discussions at numerous CFPF working group meetings and national forums have produced extensive dialogue and suggestions about how the product registration system can be improved to protect human and environmental safety, while increasing innovation in the industry and reducing burdens on customers, companies, and regulators. The current registration backlog is viewed as an inherent problem resulting from a registration process in need of an overhaul as well as a lack of knowledge about the application process and requirements by registrants. The registration backlog as of November 2007 was 860 files with a wait time for review of 17 months.

The Product Registration report focuses on a number of key issues of relevance to the fertilizer and supplements products registration process. Background, research, and recommendations are provided about the following issues:

- Customer needs for regulation and oversight
- The registration backlog problem
- Creating a multi-tiered registration process
- Streamlining the label review process
- Achieving greater harmonization internationally
- Increasing compliance and focusing enforcement
- Addressing resource shortages at the CFIA
- Understanding the true economic impact of the regulatory burden for fertilizer and supplements products
- Improving the research approval system
- Adding greater clarity about efficacy requirements
- Product registration for biosolids
- The role of the CFIA must continue to evolve

VALUE TO FARMERS

Fertilizer is the single largest input cost for grain farmers in Canada. Fertilizer innovations have dramatically increased farm production and it is estimated that 40% of the increase in crop production in Canada over the past 40 years can be attributed to improved use of fertilizers and supplements that have helped make up for farmland lost to expanding cities and wildlife habitat protection zones¹. Farmers continue to look for innovation in fertilizer products to support their ability to feed and fuel a growing world and they recognize that changes to the Canadian fertilizer regulatory structure could hasten this innovation.

In a presentation to the 2007 National Forum, Bob Friesen, President of the Canadian Federation of Agriculture, outlined some key issues that need addressing to ensure competitiveness regarding the fertilizer and supplements sector, including:

- Fertilizers are important to agriculture
- Need for an efficient and timely regulatory system for fertilizers
- Access to new and innovative fertilizer products
- Science-based regulations
- Need for further research and development (regional and commodity specific)

He challenged the CFPF to work with farmers to address these issues.

Farmer Engagement in CFPF

Farmers, as the single largest group of customers for Canadian fertilizer and supplement products in Canada², have been fully engaged as stakeholders throughout the CFPF process. Farmers and farmer-based organizations have participated in the CFPF Executive, various WGs, and attended both national Forums in Ottawa. In addition, the Ipsos Reid research conducted for the CFPF was dedicated to understanding farmers' usage of and perceptions about fertilizer and supplement products.

Farmers' opinions have been directly brought to the CFPF through representation on the Executive Committee by the Grain Growers of Canada, Alberta Barley Commission, National Farmers Union, and the Canadian Federation of Agriculture.

Farmers on Fertilizer and Regulatory Oversight

While farmers believe that the regulatory system does a good job of regulating fertilizer and supplement products to ensure they are safe and effective, during several Forum meetings farmer members said that regulatory oversight on fertilizer and supplement products limits gains in crop productivity and hinders their ability to run business efficiently.

¹ Opening Remarks by Peter McCann, CFPF National Forum, November 2007

² Opening Remarks by Craig Rickard, CFPF National Forum, November 2006

According to a recent Ipsos Reid survey on farmer attitudes toward the fertilizer and supplements industry, 75%³ of farmers across Canada believe that the CFIA does a good job of regulating fertilizer and supplement products to ensure they are safe and effective. However, farmer participants in both national forum meetings, and in WG meetings of the CFPPF, including the Efficacy Task Force, have clearly said that they are disappointed in the level of innovation and introduction of new fertilizer and supplements products in Canada. They see products being used only a few hundred kilometers away in the U.S. or in the EU and believe the regulatory and registration system inhibits introduction of these same products in Canada.

Farmers at these meetings have also said that this lack of innovation affects the bottom line of their business because it limits their ability to maximize crop productivity. In fact, Ipsos Reid confirmed that the main reason that farmers use fertilizers and supplements is to maximize yields.⁴ This is even more critical in today's world when talks about food shortages and competition for feedstocks for food and fuel are a daily event.

The main reason that farmers would decrease their fertilizer use is because of cost, reported Ipsos Reid⁵. The introduction of new efficient release fertilizers and other innovative products could help farmers not only better control their input cost, while maintaining or increasing their productivity, but also reduce their environmental footprint through the use of less fertilizers.

The membership of the Canadian Federation of Independent Business (CFIB) includes many agri-business clients. Marilyn Braun-Pollon, Vice-President, Saskatchewan and Agri-business at the CFIB, spoke to CFPPF members during the 2007 Forum. In their recent report on Red Tape, the CFIB estimated the cost of excess regulation (from federal, provincial, and municipal levels) on the Canadian economy is \$33 billion annually⁶ and the impact of the red tape was found to be most prevalent on the agriculture sector. Regulations enforced under the authority of the CFIA and environmental agencies had the greatest regulatory impact on the agriculture sector.

Involving Farmers in the Future

During the National Forum in November 2007, farmers voiced their support for the work of the CFPPF, noting that they would be direct beneficiaries of achievements made by the Forum⁷. Several new CFPPF farmer participants were encouraged by the previous work of the CFPPF and they called for continued work by the organization. They requested that the CFPPF reach out to individual farmers, rather than focusing on farm organizations, even more so than they had done in the past. Note that the CFPPF delivered the results of the Ipsos Reid farmer survey directly to farmers via the Canadian Federation of Agriculture database of farmers.

Specific recommendations regarding farmer participation included:

- Farmers should be more fully engaged in the efficacy work of the CFPPF
- Farmers are under-represented in the CFPPF REWG
- It was also noted that while the farm organizations had familiarity with the CFPPF, the average farmer had little or no knowledge of the CFPPF and the impact its work could have on farmer's largest input cost

³ Ipsos Reid, "Attitudes and Usage of Fertilizers and Supplements", June 2007

⁴ Ipsos Reid, "Attitudes and Usage of Fertilizers and Supplements", June 2007

⁵ Ibid.

⁶ Marilyn Braun-Pollon, speech to CFPPF, November 26, 2007.

⁷ Wendy Omvlee, CFA, CFPPF National Forum, November 2007.

ACCOMPLISHMENTS AND MILESTONES

The leadership of the CFPF developed an aggressive work plan for execution. With excellent participation by industry, other stakeholders, and the regulatory agency many milestones have been reached and key accomplishments made. The complete results of the entire work plan are found in the Appendix G.

The accomplishments that the CFPF is most proud of include:

1. Established an open, honest, and productive working relationship between stakeholders in the fertilizer and supplements industry and the CFIA Fertilizer Section. This new working relationship will have a lasting impact on both the industry and CFIA.
2. Farmers were actively engaged in the CFPF process and they expressed how their participation was critical for bringing new innovation to the farm. Fertilizer and supplements industry representatives commented that farmer participation had created significantly more to the outcomes produced by CFPF than would have been generated without their participation.
3. The work of the CFPF is considered valuable to industry, stakeholders and government, and at the last Forum, members called for a mechanism to continue the work of the CFPF after ACAAFF funding had expired.
4. Provided strong guidance to CFIA management about the impact of the Fertilizer Section resourcing shortages on the ability of the industry to operate. The CFPF provided the venue needed to call on government to increase resources to the section to help alleviate the tremendous backlog of application reviews.
5. Commitment by industry throughout the CFPF was tremendous. The CFPF received broad industry participation and all WGs and the Executive Committee experienced strong commitment from individual members to get the job of the CFPF done.
6. Provided CFIA with sound efficacy recommendations that will become the basis for making changes in fertilizer efficacy policy. As a result of the Task Force contribution, on June 13, 2008 CFIA issued revised efficacy data requirements for fertilizers and supplements in an updated *T-4-108: Guidelines for Field Testing Supplements*
7. Fully reviewed T-4-103 and provided clear guidance to CFIA on how the policy could be improved to benefit all stakeholders.
8. Delivering two successful national forums in Ottawa. Participants offered extremely positive comments regarding the success of the CFPF and its achievements.
9. Provided CFIA with direction on a path forward for the non-functional Canadian Fertilizer Quality Assurance Program.
10. Aided CFIA in focusing its enforcement activities on non-compliant and improperly labeled products to ensure better security and safety for consumers.

11. Developed and promoted a unique identity for the CFPPF. This included launching the CFPPF web site, which has grown into a comprehensive information resource about the CFPPF as well as a resource on Canada's fertilizer and supplements industry.
12. Completed a nation-wide survey of 400 farmers about their attitudes, perceptions and usage patterns for fertilizer and supplement products.

NEXT STEPS

With many achievements having been made during the past two years, members of the CFPPF moved on to discuss the future of the CFPPF, a major discussion point during the CFPPFnational forum in November 2007. The membership offered strong encouragement to find a way to continue the work of the CFPPF so that the momentum and new efforts forged during the past two years is not lost.

Quotes from members included:

“We need to keep this going. The current situation is making us uncompetitive versus our competitors across the border. We should look outside the current group for political and financial support.”

“This is the end of the beginning with more work to go on.”

“CFIA’s inability to implement the changes we have recommended is a concern and a bit of a disappointment.”

“If we establish a permanent consultative body how can environmental representatives be more fully engaged and where will funds be obtained to help them to participate?”

“Both the CFPPF and National Forum on Seed fall into the category of best practices both in the context of the Canadian government and the practice of public consultation.”

There is general agreement that the CFPPF work is far ahead of CFIA’s capacity to address the outcomes of the WGs. There is also general consensus that a national Forum of some type is needed to keep the momentum going but that continued participation by members would be contingent on concrete results and implementation of the recommendations at a governmental level.

Organization structures that were considered included:

1. Create a not-for-profit membership, based on CFPPF with 2 staff
2. Similar to Association of American Plant Food Control Officials (AAPFCO) – one conference and maintenance of web site, on-going volunteer work throughout the year
3. Seek out funding to continue as a permanent consultative body

Conclusions on Path Forward:

1. There is a general willingness to keep CFPF going
2. Some members of the CFPF Executive are interested in inquiring into additional federal funding for a permanent consultative body for fertilizer and supplements.
3. In the interim, CFI will provide for minimum maintenance of the web site, an occasional Executive conference call, and helping to organize a final stakeholder meeting in October 2008.

CFI has been clear of its intention to scale back the activities of the CFPF going forward. CFI will continue, however, with maintenance of the website, an occasional Executive conference call and helping to organize a final stakeholder meeting in October 2008.

LESSONS LEARNED

The scope and breadth of the CFPF has been a large undertaking but the success of the Forum is evident in the countless hours of volunteer time in meetings and drafting recommendations, the volumes of reports, and the long list of recommendations that have been carefully drafted and sent to CFIA for consideration. Not surprisingly, CFPF members have exceeded their required in-kind contribution to the project through their countless hours of work on the project.

With an undertaking of this size the CFPF has had to establish processes to help a national team of volunteers work in the most efficient and effective means possible. The lessons learned by the CFPF will assist future efforts of this group as well as provide best practices and guidance for other Forums that strive to achieve similar goals for stakeholder engagement.

These lessons include:

1. Begin with a plan
2. Focus on deliverables that are doable
3. Develop a process to support good dialogue with the regulator
4. Develop a process to keep strong dialogue between the Executive Committee and WGs to reduce overlap and ensure the overall plan is being implemented. This was achieved by having an Executive member on each WG.
5. Use common reporting processes such as common agenda and minute formats
6. Communicate with the members often to keep them engaged – regular Member Updates
7. Minimize cost – conference calls were the primary medium of communication rather than face-to-face meetings. Web-based mediums may also be beneficial.
8. Use professional facilitation to keep things on track and to help deal with challenging situations. It's easy to head down a bunny trail or get bogged down in too much detail.
9. Compromise is necessary when striving for consensus - it's critical to hear from all stakeholders
10. Diversity of stakeholder leads to better recommendations and produces a more persuasive argument for government
11. CFIA can be slow to implement change in part due to resourcing requirements and in part due to a large mandate
12. Two things are important to government relations: be consistent and be persistence.
13. Engage the regulator in WG discussions as much as possible. They bring new knowledge to the table, they gain a better understanding of the issues, and their participation results in stronger recommendations.
14. The regulator can be a partner rather than an adversary

APPENDIX A – CFPF STRATEGIC PLAN

The Executive Summary of the plan is presented here. For the entire 33 page strategic plan go to http://cfpf-fcpf.ca/files/PDF/FINAL_Strategic_Plan__20_June_2007.pdf

Executive Summary

A strategic plan is a guiding document that enables an organization to articulate a short term plan (usually 3-5 years) of how it will successfully meet its mandate (a succinct statement that documents member priorities and complies with the organizational charter), fulfill its mission (a series of statements that puts the mandate into action), and realizes its vision (imagined future).

This document has been developed through a series of discussions, and extracted from the minutes and notes of Working Groups that were established around key results areas (KRA's). KRA's are the broad areas within the Canadian Fertilizer Sector that the CFPF seeks to influence. The Key Results Areas have evolved organically as required throughout the CFPF strategic plan development process.

There are presently 6 Key Results Areas identified for the CFPF, each of which are supported by an active Working Group. They are:

1. Executive Committee
2. Biosolids & Compost
3. Communications and Operating Environment
4. Efficacy
5. Marketplace Monitoring and Labelling
6. Regulatory Efficiency

Each of the KRA's have developed a mandate, and identified a series of Strategic Objectives (projects and program elements) that, taken together, will realize the desired key results, which are identified under the KRA charts. They have also identified a series of Operational Goals (a collection of milestones and tasks) related to each Strategic Objective that constitute an action plan. The charts below are intended to be used by the KRA working groups on an ongoing basis, and will provide a measure of success around how well the CFPF is achieving its key results.

APPENDIX B – CFPF MEMBERSHIP LIST

Canadian Fertilizer Products Forum Membership List	
Organization	Participant
A & L Labs East	Ross Stone
A&L Canada Laboratories East, Inc.	Rob Deakin
A&L Laboratories	Ross Stone
Acadian Seaplants Ltd.	Natalia Melo
Agri Quanta (Labs)	Michel St-Pierre
Agribusiness, Food & Animal Health	Kent Goldie
Agrico Canada/CFI	Dan Rivait
Agricore United	Bill Kuzyk
Agricultural Alliance of New Brunswick	
Agricultural Institute of Canada	Jean Sullivan
Agricultural Institute of Canada	Tom Beach
Agricultural Producers Asc. Of SK	
Agri-Environmental Policy Bureau	Tim Marta
Agri-Food Laboratories	Papken Bedirian
Agrium Advanced Technologies, Turf Division	Achille Correggia
Agrium Inc.	Craig Rickard
Agrium US Inc.	Ron Restum
Agro Envirolab (Labs)	Michel Champagne
Agro Mart Group	Eric Bosveld
Agro-100 (micronutrients)	Jean-Marc Hamois
Agronomy Company of Canada Ltd.	Brandon Yott
Agrotain International Inc.	Timothy Healey
Agrowchem Inc.	George Kanellos
Agrowchem Inc.	Ted Kanellos
Agrowchem US	Dr. Der-I Wang
Ag-West Bio	Darcy Pawlik
Akzo Nobel Functional Chemicals	Larry Wilde
Akzo Nobel Functional Chemicals	Marcel Morin
George Morris Centre	Al Mussell
Alberta Pulse Growers	Janette McDonald
Alberta Sugar Beets Growers	Allen Klassen
American Water Canada Corp.	Dr. Mel Webber
American Water Canada Corp.	Mel Webber
American Water Canada Corp.	Phil Sidhwa
AQIC (Association quebecoise des industriels du compostage inc.)	Denis Potvin
Aquatrols Corp of America	Irene Karas
Atlantic Fertilizer Institute	Greg Donald
Atlantic Fertilizer Institute	Jack Cutcliffe
Atlantic Fertilizer Institute	Peter Northcott
Becker Underwood	Allison Gallinger
Becker Underwood	Ben Libby

Becker Underwood	Piran Cargeeg
BioSynterra Solutions Inc.	Peter Moutoglis
Canadian Federation of Agriculture	Bob Friesen
Bodycote Testing Group/Norwest Labs	Danial Heaney
British Columbia Agriculture Council	
Burea De Normalization Du Quebec	
Bureau du Normalisation du Quebec	Andreanne Bilodeau
Bureau du Normalisation du Quebec	Sylvain Allard
C2HM Hill	Janice Janiec
Cabinet Committee Operations	Karen Zarrouki
Canadian Association of Agri-Retailers (CAAR)	Andrew Senkiw
Canadian Association of Agri-Retailers (CAAR)	Jacqueline Ryrie
Canadian Association of Agri-Retailers/Okanagan Fertilizer Ltd.	Ken Clancy
Canadian Broiler Hatching Egg Marketing Agency	
Canadian Cattlemen's Association	Ryder Lee
Canadian Egg Marketing Agency	
Canadian Environmental Network	Dan Casselman
Canadian Federation of Agriculture (CFA/UPA)	Brigid Rivoire
Canadian Federation of Independent Business	Dan Kelly
Canadian Federation of Independent Business	Marilyn Braun-Pollon
Canadian Fertilizer Insitute (CFI)/Agrium	Doug Beaver
Canadian Fertilizer Institute	Carla Ventin
Canadian Fertilizer Institute	Clyde Graham
Canadian Fertilizer Institute	Susan Sykes
Canadian Horticultural Council	Anne Fowlie
Canadian Horticultural Council	
Canadian National Biosolids Partnership	Ron LeBlanc
Canadian Nursery Landscape Association	Victor Santacruz
Canadian Organic Growers	Janine Gibson
Canadian Pork Council	Anita DeCoste
Canadian Seed Coaters	Kelly Ray
Canadian Seed Growers Association	Dale Adolphe
Canadian Society of Soil Science	Craig Drury
Canadian Sugar Beet Producers' Asc.	
Canadian Turkey Marketing Agency	
Canadian Water and Wastewater Association	Adrian Toth
Canadian Water and Wastewater Association	Duncan Ellison
Canadian Water and Wastewater Association	Iva Vasileski
Canadian Water and Wastewater Association/Curry Jefferson & Associates Environmental Services Inc.	Catherine Jefferson
Canadian Wheat Board	
Canola Council of Canada	JoAnne Buth
Canola Council of Canada	John Mayko
Canola Council of Canada	
CANTOX HEALTH SCIENCES INTERNATIONAL	Jessica Walsh
Cantox Health Sciences International	Lois Haighton
Canvendish Agri/Atlantic Fertilizer Institute	David Smith
Cavendish Agri	Stephen Paget
CCME Municipal Wastewater Effluent Development Committee, Biosolids Sub-Group	Dave Briggins
Certified Crop Advisor (CCA) - Regional Boards	Adam Hayes

Certified Crop Advisor (CCA) - Regional Boards	Norm Flore
CFIA	Adam Giles
CFIA	Alan Hamilton
CFIA	Andre Gravel
CFIA	Anthony Parker
CFIA	Benoit Dube
CFIA	Dave Finlayson
CFIA	Douglas Sasaki
CFIA	Ewa Madey
CFIA	Glyn Chancey
CFIA	Haley McKinnon
CFIA	Javier Maldonado
CFIA	Jennifer Armour
CFIA	Jennifer Roach
CFIA	Julie Chagnon
CFIA	Kate Billingsley
CFIA	Kathleen Dickenson
CFIA	Lisa Major
CFIA	Luc Mougeot
CFIA	Marc de Wilt
CFIA	Michelle Prevost
CFIA	Nathan Owen-Going
CFIA	Peter Pauker
CFIA	Rob Murray
CFIA	Roger Larson
CFIA	Ryan Ring
CFIA	Sarah Sewter
CFIA	Susana Aclan
CFIA	Urbee Shome
CFIA	Winnie Cheng
CFIA	Steve Yarrow
CFIA	Helen Hayes
Chicken Farmers of Canada	
CIBA Specialty Chemicals Canada	Joyce Borkhoff
Circle Associates	Stephani Roy McCallum
City of Ottawa	Matthew Hamilton
City of Toronto/WEAO	Mark Rupke
City of Windsor, Environmental Services	Kit Woods
Clarkson Consulting Inc.	Ed Clarkson
Compost Council of Canada	Maite Chantepi
Compost Council of Canada/All Treat Farms	Rod Kidnie
Compost Quebec	Julie Desforges
Composting Council of Canada	Mitch Banks
Composting Council of Canada	Susan Antler
Consumers' Association of Canada	Bruce Cran
Cooperative Federee de Quebec	
Cooperative Federee de Quebec and Agridirect	Diane Laquerre
Crop Bioscience	Chunquan Chen
Crop Bioscience	Punita Aneja, PhD
CropLife Canada	Lorne Hepworth

CropLife Canada	Peter MacLoed
Dairy Farmers of Canada	
Department of Environment and Conservation	Haseen Khan
Dialogue Partners	Kareen Lively
Dialogue Partners	Richard Delaney
Ducks Unlimited	Barry Turner
Ducks Unlimited	Jack Messer
Eastern Canada Soil & Water Conservation Centre (Universite de Moncton)	Gordon Fairchild
EMD CropBioscience	Peter MacIntosh
EMD CropScience	Cathy Soanes
EMD CropScience	Anita Whiteley
EMD CropScience	Stew Smith
Environment Canada, Consumer & Commercial Products	France Jacovella
Environment Canada, New Substances Branch	Anne O'Toole
EPB, Saskatchewan Environment	Arasu Thirunavukkarasu
Evergreen Bio-Ceuticals Inc.	Warren Libby
Farm Leadership Council	John Bumbac
Farm Leadership Council	Ted Sells
Federation of Canadian Municipalities	Michael Coleman
Fertichem	Christian Prud'homme
Fertichem	Martin Bisailon
Fertichem/Eco Plus (micronutrients)	Marc Richard
Floratine Ag Solutions	Bill Zimmer
Gaia Green	Micheal Dean
George Morris Center	Beth Sparling
Government of British Columbia	Geoff Hughes-Games
Grain Growers of Canada	Richard Phillips
Grain Growers of Canada (GGC)	Bob Bartley
Grain Growers of Canada representative/Alberta Barley Commission	Mike Leslie
Graymor Group	Perry Graham
Greater Moncton Sewerage Commission	Roland Richard
Greater Vancouver Regional District	Patrick Plouffe
Greenstar Plant Products Inc.	Ruth Roberts
Grow Tec Seed Coatings	John Cooper
GSI Environnement	Eric Cormier
H & M Turf Ltd.	Brett Murray
Habitat Protection and Sustainable Development, Fisheries and Oceans Canada	Patrice Leblanc
Halifax Regional Municipality	Tony Blouin
Health Canada (Pest Management Regulatory Agency)	Pierre Petelle
Health Canada (PMRA)	Richard Aucoin
Helena Chemical Company	Alan Underwood
HydraLogic Systems Inc.	Thea Saarimaki
Independent Dealers Entrepreneurial Association (IDEA)	Blaine Canitz
Issues & Insights	Robynne Anderson
Issues Ink	Kelly Green
Issues Ink	Robynne Anderson
J.R. Simplot Company	Garrett Lofto
James Richardson International	Steve Biggar
Canadian Seed Institute	Jim McCullagh
JMRC	George J. Mudryj

JMRC	Lina Dzubenko
American Plant Food Control Officials	Joe Slater
Fraser Milner Casgrain law Firm	John Blakney
JRI	Al Raine
JRI	Jeff Kisiloski
Kemptville College/University of Guelph	Jim Fisher
Kemptville College/University of Guelph	Jon Klapwyk
Keystone Agricultural Producers	
La Coop federee	Nathalie Frenette
Lakeland College, Agricultural Sciences	Josie Van Lent-Staden
Landscape Trades	Allan Dennis
Les Composts due Quebec Inc.	Isabelle Lessard
MacDonald Campus of McGill University	Chandra Madramootoo
Manitoba Conservation - Livestock Stewardship Program	Al Beck
Manitoba Pulse Growers Asc. Inc.	
Manitoba Water Stewardship - Water Quality Management	Dave Green
Maple Turf Supply	Rae Murray
Canada Border Services Agency	Mark Willcox
Maureen Reilly (environmental consultant)	Maureen Reilly
MGS Horticultural Inc.	Kelly Devaere
Micronutrient Fertilizer Association of Canada	Jereleen Brydon
Miller Waste Systems	Tom Hennessey
Miller Waste Systems	Tom Miller
Milorganite	Mike Archer
Ministère du Developpement durable, de l'Environnement et des Parcs	Marc Hebert
Ministry of the Environment	Nina Koskenoja
Modugno-Hortibec	Rene Modugno
Monachus	Sally Rutherford
Mosiac Potash	Del Ferguson
Mouvement Au Courant	John Burcombe
National Farmers Union	Darrin Qualman
National Farmers Union	David Colling
National Farmers Union (NFU)	Terry Pugh
National Farmers Union/Laval University	Jean-Paul Laforest
Newfoundland & Labrador Federation of Agriculture	
Nitragin	John C. Hren
Nitragin Inc.	Scott Fleetwood
Nitrite/Fertichem/Ontario Agri Business Association (OABA) L&G	Ken McLeod
Nova Scotia Agricultural College	Derek Anderson
Nova Scotia Department of Environment and Labour	Alan Benninger
Nova Scotia Environment and Labour	Michael Langman
Nova Scotia Federation of Ag.	
Nu-Go Ltd (Agrium)	Crystal Chiasson
Nu-Gro Canada	Achille Correggia
Nu-Gro Canada	Suzanne Beattie
Nugro/Spectrum/Ontario Agri Business Association (OABA) L&G	Dave Watson
Nutri Ag	Martin Bloomberg
NutriAg Ltd.	Mark McMillan
Nutrite	Ken McLeod
Ontario Agri Business Association (OABA) Lawn & Garden Committee	Paul Lefebvre

Olds College	Joel Gingrich
Oligosol Ltd.	Claude Gagnon
Omex Agriculture	Jarrett Chambers
Ontario Agri Business Association	Tracey Forrester
Ontario Agri-Business Association (OABA)	Dave Bутtenham
Ontario Federation of Agriculture	Wendy Omvlee
Ontario Federation of Agriculture	
Ontario Ministry of Agriculture	Larry Schut
Ontario Ministry of Environment - Standards Development Branch	Tony Ho
Ontario Ministry of the Environment	Bonnie Wilkinson
Peter McLeod	CropLife Canada
PGRs - Emerald BioAgriculture Corporation/BioPesticides Industry Alliance	Gary Libman
Philom Bios Inc.	Calvin Sonntag
Philom Bios Inc.	Dean Thome
Philom Bios Inc.	Gary Hnatowich
Plant Inoculants Canada	Peter McCann
Plant Inoculants Canada/Brett-Young Seeds	Manas Banerjee
Plant Products Co. Ltd.	Jennifer Hale
Plant Science	Rob Field
Pest Management Regulatory Agency (PMRA)	Rob Ward
PMRA	Vicky Godfrey
PMRA - Efficacy and Sustainability Assessment Division	Andrew Russell
Potash & Phosphate Institute of Canada	Tom Bruulsema
Potash and Phosphate Institute of Canada (PPIC)	Adrian Johnston
Potash Corp of Saskatchewan	Ross M. Mireau
Precision Laboratories, Inc.	Don Spier
Premier Tech Biotechnologies	Annie Bourassa
Premier Tech Biotechnologies	Dominique Le Quere
Premier Tech Biotechnologies	Genevieve Roy
Prince Edward Island Federation of Ag. Farm Centre	
Quadra Chemicals	Walter Banas
Quebec Fertilizer Manufacturers Association	Yvan Lacroix
R.J.(Bob) Evans, P.Ag.	Bob Evans
R.V. Anderson Associates Limited	Trish Johnson
Retail Council of Canada	Diane Brisebois
Saskatchewan Agriculture and Food, Provincial Soils Specialist	Ken Panchuk
Saskatchewan Wheat Pool	Troy Bolt
Scotts Canada Ltd.	Heather Kenney
Scotts Canada Ltd./OABA/L&G	Valerie Bertrand
Scotts Company	Brian Birrenkott
Scotts Fertilizer	Rod Eller
Senior Environmental Policy Analyst, AAFC	Jill Jensen
Sierra Club	Elizabeth May
Sierra Club of Canada	Lilly Briggs
Soil Conservation Council of Canada	Don McCabe
Soil Conservation Council of Canada	Doug McKell
Specialty Fertilizer Products	Jake Sanders
Sure-Gro Inc.	Arlene Kappheim
Spectrum Brands Canada	David Watson
Spectrum Brands Canada	Shaun Purcell

Stephani Roy McCallum	Circle Associates
Stoller Canada	Wayne Izumi
Sylvite	Bob McNaughton
Sylvite Sales Inc.	Geoff Jones
Synagri S.E.C.	Pierre Lamoureux
Terratec Environmental Ltd./American Water Canada Corp	Frank Radocaj
The Canadian Federation of Ag.	Shannon Watt
The Fertilizer Institute	William Hertz
The Scotts Co/Scotts-Sierra Horticultural Products Co.	Deena Newell
Treasury Board of Canada Secretariat	Aline Dimitri Ph.D.
Treasury Board of Canada Secretariat	Mireille Durocher
Turf Revolution	Jeff Lowartz
Turf Revolution	Tammy Lawrence
U of BC Okanagan	Dr. Louise M. Nelson
U.S. Borax	Phil Petersen
Union de Producteurs Agricoles	
United Agri Products Canada	Jeff Preszcator
University of Guelph	Craig Pearson
University of Saskatchewan, College of Agriculture	Graham Scoles
University of Saskatchewan, College of Agriculture	Jeff Schoenau
Veolia Water Canada Inc.	Chris Rupke
Veolia Water North America	Michael Wheeler
Viterra	Donald Poisson
Water Environment Association of Ontario	Don Hoekstra
Water Holding Polymers - JRM Chemical Inc.	Dave Czehut
WCI Waste Conversion Inc.	Phil Kerrigan
Western Cooperative Fertilizers Ltd	Rigas Karamanos
Western Farm Leadership Co-op.	
Wild Rose Agricultural Producers	
Wolf Trax Inc.	Collin Gyles
Wolf Trax Inc.	Geoffrey Gyles
Wolf Trax Inc.	Mark Godwin
Yara	Sylvain Lavoie
Yara Canada Inc.	Gilles D. Payette
Yara Phosyn	Elaine Jenneson
Yara Phosyn	Adam Richardson
Yara Phosyn	Dr. Kevin Moran

APPENDIX C – WORKING GROUP MEMBERS

MMLWG Members

Paul Lefebvre (chair)	Gardenworth/OABA Lawn & Garden Committee
Achille Correggia	Agrium Advanced Technologies
Andréanne Bilodeau	Bureau de normalisation du Québec (BNQ)
Andrew Senkiw	Canadian Association of Agri-Retailers
Arlene Kappheim	Spectrum Brands Canada Inc.
Benoit Dubé	CFIA
Catherine Jefferson	Canadian Water and Wastewater Association/Curry Jefferson & Associates Environmental Services Inc.
Dave Watson	Spectrum Brands Canada Inc.
Don McCabe	Soil Conservation Council of Canada
Eric Bosveld	Agromart
Garry Hnatowich	Philom Bios Inc.
Geneviève Roy	Premier Tech Biotechnologies
Irene Karas	Aquatrols Corporation
Ken Panchuk	Saskatchewan Agriculture & Food
Luc Mougeot	CFIA
Rod Kidnie	Compost Council of Canada/All Treat Farms Ltd.
Ryan Ring	CFIA
Shaun Purcell	Spectrum Brands Canada Inc.
Susan Antler	Composting Council of Canada
Sylvain Allard	Bureau de normalisation du Québec (BNQ)
Troy Bolt	Viterra
Valerie Bertrand	Scotts Company
Robynne Anderson	Issues & Insights
Kelly Green	Issues & Insights

Labelling Sub-Committee Members

Paul Lefebvre (Chair)	Gardenworth/Ontario Agri Business Association (OABA) Lawn & Garden Committee
Adam Giles	CFIA
Arlene Kappheim	Spectrum Brands Canada Inc.
Benoit Dubé	CFIA
Bob McNaughton	Sylvite
Brian Birrenkott	Scotts Company
Catherine Jefferson	Canadian Water and Wastewater Association/Curry Jefferson & Associates Environmental Services Inc.
Dave Watson	Spectrum Brands Canada Inc.
Geoff Gyles	Wolf Trax
Irene Karas	Aquatrols Corporation
John Burcombe	Mouvement Au Courant
Ken Panchuk	Saskatchewan Agriculture and Food
Norm Davy	Agrotain International
Sylvain Lavoie	Yara
Tim Healey	Agrotain International
Valerie Bertrand	Scotts Company
Kelly Green	Issues & Insights
Robynne Anderson	Issues & Insights

Efficacy Task Force Members

Aquatrols Corporation	Irene Karas
Becker Underwood	Piran Cargeeg
Becker Underwood	Allison Gallinger
Brett Young	Manas Banerjee
CFIA	Anthony Parker
CFIA	Samielle Hynes
CFIA	Kathleen Dickenson
EMD CropBioScience Canada Inc.	Warren Libby
EMD CropBioScience Canada Inc.	Punita Aneja
EMD CropBioScience Canada Inc.	Chunquan Chen
Floratine Ag Solutions	Bill Zimmer
Issues & Insights	Robynne Anderson
Issues & Insights	Kelly Green
Mosiac	Tom Staples
Philom Bios Inc.	Dean Thome (Chair)
Plant Products Co. Ltd.	Jennifer Hale
Premier Tech Biotechnologies	Dominique LeQuéré
Premier Tech Biotechnologies	Geneviève Roy
Quadra Chemicals	Walter Banas
Soil Conservation Council of Canada/Alberta Conservation Tillage Society	Josie Van Lent-Staden
Soil Conservation Council of Canada	Gordon Fairchild

Wolf Trax	Geoff Gyles
Wolf Trax/MFAC	Mark Goodwin
Yara Phosyn	Kevin Moran

CFQAP Sub-Committee Members

Ken Clancy (Chair)	Canadian Association of Agri-Retailers/Okanagan Fertilizer Ltd.
Adam Giles	CFIA
Andréanne Bilodeau	Bureau de normalisation du Québec (BNQ)
Art Van Asselt	Sylvite Agri-Services Ltd. Ontario Agri Business Association (OABA)
Benoit Dubé	CFIA
Bob Evans	Independent Dealer Entrepreneurial Association
Bob McNaughton	Sylvite Sales
Brian Coutts	Thompsons Limited
Claude Gagnon	Oligosol Ltd.
David Smith	Canvendish Agri/Atlantic Fertilizer Institute
Denis Potvin	AQIC (Association quebecoise des industriels du compostage inc.)
Don Henderson	Agromart Group
Don McCabe	Soil Conservation Council of Canada
Don McLachlan	Southern Co-operative Services
Greg Patterson	A&L Canada Laboratories East, Inc.
Ian McLachlin	A&L Canada Laboratories East, Inc.
Jeff Kisiloski	JRI
Jennifer Hale	Plant Products Co. Ltd.
Marc de Wit	CFIA
Maureen Reilly	Environmental consultant
Michel Champagne	Agro-Enviro-Lab
Nathalie Maltais	La Coop federee/QFM
Papken Bedirian	Agri-Food Laboratories
Pascal Weijters	Akzo Nobel Functional Chemicals MMLWG Chair/Gardenworth/Ontario Agri Business Association (OABA) Lawn & Garden
Paul Lefebvre	
Peter Northcott	Atlantic Fertilizer Institute
Ron Campbell	Ontario Agri Business Association
Ross Mireau	Potash Corp of Saskatchewan
Shaun Purcell	Spectrum Brands Canada Inc.
Stephen Paget	Cavendish-Agri
Thea Saarimaki	HydraLogic Systems Inc.
Tracey Forester	Ontario Agri Business Association
Troy Bolt	CFI Products Committee/Viterra
Yvan Lacroix	Quebec Fertilizer Manufacturers' Association
Robynne Anderson	Issues & Insights
Kelly Green	Issues & Insights

Biosolids WG Members

Susan Antler, Composting Council of Canada
Mike Archer, Milorganite
Kate Billingsley, CFIA
Jack Bryden, British Columbia Ministry of Environment
John Burcombe, Mouvement Au Courant
Marc Hebert, Gouvernement de Québec
Don Hoekstra, Water Environment Association of Ontario
Janice Janiec), Water Environment Assoc. of Ontario
Catherine Jefferson, Curry Jefferson & Associates Environmental Services Inc.
Canadian Biosolids Partnership, and Water Environment Assoc of Ontario
Haseen Khan, Dept. of Environment and Conservation Government of Newfoundland and Labrador
Michael Langman, Nova Scotia Environment and Labour
Rob Murray, CFIA
Wendy Omvlee, Canadian Federation of Agriculture
Maureen Reilly, Sludge Watch
Roland Richard, Greater Moncton Sewerage Commission
Larry Schut, Ontario Ministry of Agriculture, Food & Rural Affairs
Phil Sidhwa, American Water Canada Corp.
Marke Teshima, SYLVIS
O.S. (Arasu) Thirunavukkarasu, Saskatchewan Environment
Adrian Toth, Canadian Water and Wastewater Assoc.
Mel Webber, Webber Environmental
Bonnie Wilkinson, Ontario Ministry of the Environment

REWG Members

Punita Aneja, EMD Crop BioScience Inc
Jennifer Armour, Fertilizer Safety Office, CFIA
Suzanne Beattie, Agrium Advanced Technologies
Joyce Borkhoff, Ciba Specialty Chemicals
Jereleen Brydon, Micronutrient Fert. Assoc. of Canada
John Burcombe, Mouvement au Courant
Piran Cargeeg, Becker Underwood
Chunquan Chen, EMD Crop BioScience Inc
Achille Correggia, Agrium Advanced Technologies
Kelly Devaere, MGS Horticultural Inc
(Bob) R.J. Evans
Allison Gallinger, Becker Underwood
Rachel Geddy, CFIA
Jennifer Hale, Plant Product Co.
George Kanellos, Agrovchem
Rigas Karamanos, Westco Alliance
Irene Karas, Aquatrols
Warren Libby, EMD Crop BioScience Inc
Peter MacIntosh, EMD Crop BioScience
Ewa Madey, CFIA
Javier Maldonado, CFIA
Peter McCann, Brighton BioConsulting
Haley McKinnon, CFIA Efficacy Evaluator,
Kevin Moran, Yara Phosyn
Peter Moutoglis, Premier Tech
Louise Nelson, University of B C (Okanagan)
Anthony Parker, CFIA
Ginette Rambie, Ciba Specialty Chemicals
Maureen Reilly, Sludge Watch
Geneviève Roy, Premier Tech Biotechnologies
Beth Sparling, George Morris Centre
Tom Staples, Mosaic Company
Dean Thome, Philom Bios Inc
Jessica Walsh, Cantox Health Science Int.

COEWG Members

Susanna Aclan	CFIA
Susan Antler	Composting Council of Canada
Michael Banks	Compost Council of Canada
Kate Billingsley	CFIA
Maite Chantepi	Compost Council of Canada
R. Field	
Tom Hennessey	Miller Paving Limited
Janice Janiec	CH2M Hill
Arlene Kappheim	Spectrum Brands
Tom Miller	Miller Waste
Luc Mougeot	CFIA
Darcy Pawlik	Ag-West Bio Inc.
Craig Rickard	Agrium
Susan Sykes	Canadian Fertilizer Institute
Carla Ventin	CFPF
Anita Whiteley	EMD Crop Bio Science

Executive Committee

Brian Gilbertson	Agrium
Wendy Omvlee	Canadian Federation of Agriculture
Paul Lefebvre	Ontario Agri Business Association (OABA) Lawn & Garden Committee
Peter McCann	Plant Inoculants Canada
Susan Antler	Composting Council of Canada
Adrian Toth	Canadian Water and Wastewater Association
Geoff Gyles	Wolf Trax Inc.
Darrin Qualman	National Farmers Union (shares a seat with Grain Growers)
John Bumbac	Western Farm Leadership Council
Richard Phillips/ Mike Leslie	Grain Growers of Canada/Alberta Barley Commission (share with NFU)

ADVISORY MEMBERS TO EXECUTIVE COMMITTEE

Luc Mougeot	Canadian Food Inspection Agency
Ewa Madey	Canadian Food Inspection Agency

STAFF SUPPORT

Clyde Graham (Executive Director of CFPF)	Canadian Fertilizer Institute
Robynne Anderson & Stephani Roy McCallum	Issues and Insights and Circle Associates
Carla Ventin (Project Manager)	Mile26 Strategy Inc.

APPENDIX D – CAAR COMMUNICATOR

DECEMBER 2007 ISSUE

Sharing Common Ground

Farmers confident in fertilizer regulatory system

Canadian Fertilizer
Products Forum



Forum canadien sur
les produits fertilisants

Agricultural producers give a good rating to the regulatory system that ensures commercial fertilizers and supplements used in food production are safe and effective.

Three-quarters of farmers canvassed in a national survey conducted last spring by Ipsos Reid for the Canadian Fertilizer Products Forum (CFPF) have confidence in the system that regulates fertilizers and supplements. The approval rating was highest in Ontario at 86 per cent while on the Prairies it ranged from 80 per cent in Manitoba to 70 per cent in Alberta and 69 per cent in Saskatchewan. The Canadian Food Inspection Agency's role in developing and implementing standards for the quality and safety of fertilizers and supplements sold in Canada is not known to most farmers.

The survey of 400 farmers on a wide variety of soil treatment issues found that the vast majority are satisfied with the physical quality of the available fertilizers and supplements and 90 per cent approve of the blended products provided by manufacturers and retailers. About 20 per cent, however, have complained about or returned a product for being lumpy or dusty.

The survey also noted about 20 per cent of farmers mainly in the West, are aware of fertilizers or supplements that are available in other countries but that have not been approved for use in Canada. Farmers said they would like to have more choice, for example, in nitrogen and phosphate products.

Farmers said they pay close attention to the cost of fertilizers and supplements when choosing their products and also base their purchases on perceived benefit and availability. The survey also found that farmers are looking to incorporate more manure and compost on their land, when it is available, to reduce their purchased nutrient requirements. About half the respondents cited price as the main reason for using fewer products.

Among other findings in the survey, only two per cent of those polled said they had not used any fertilizers or supplements in last three years. It also found that farmers make annual use of the traditional products containing nitrogen, phosphorus and potassium but are less familiar with newer products such as wetting agents and biosolids.

A full copy of the Ipsos Reid survey is available on the CFPF website (www.cfpf-fcpf.ca). ♦

Interview with Harold Blenkhorn



Harold Blenkhorn is a spry 84-year-old retired fertilizer company specialist who has voluntarily participated in the development of Canadian organic food standards for the Canadian Fertilizer Institute. He insists that scientific realities – not unproven beliefs – should be the predominant factor in the growing of food.

Blenkhorn was presented with CFI's Award of Merit in 2004 as "a long serving member of our industry as part of the Nutritec, Nitrochem, Hydro Agri and now Yara group." The award noted that his work with the Canadian General Standards Board (CGSB) on organic food production was a thankless task.

"Harold wades through literally stacks of paper to decipher bureaucratize to try to ensure that at least some scientific principles are respected throughout their process."

Thanks to work by Blenkhorn and Tom Bruulsema of the International Plant Nutrition Institute, the CGSB has included potassium chloride on the Permitted Substances List for organic production. Its use was rejected in previous Standards.

Blenkhorn said he has unearthed many definitions of organic production and foods during the process but finds that upon examination, they have little meaning. Very often these definitions reveal profound ignorance about plant science. To say his investigations have left him somewhat skeptical of the claims made by the organic industry would be an understatement.

He explained his views in the following interview:

Q. How did you get involved?

A. I worked for many years as manager of technical services for a fertilizer company and served in effect as chief agronomist.

DECEMBER 2007 V

Sharing Common Ground

Improving fertilizer regulatory process a team effort

Canadian Fertilizer
Products Forum



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Agri-retailers and their customers stand to gain faster access to a wider variety of fertilizer products under a modernized fertilizer regulatory system, while remaining confident that the products are safe and effective.

The Canadian Food Inspection Agency (CFIA), the government regulator of fertilizers and supplements, is working to improve the regulatory system and has asked for help from the fertilizer industry. A series of discussions between government and industry led to the establishment of the Canadian Fertilizer Products Forum (CFPPF) in November 2006.

The CFPPF is an industry-led group that was formed to provide advice to government on matters relating to fertilizer and supplement policy and regulation. The CFPPF aims to enhance the reputation of the industry and confidence in its products and to plan for the future by conducting research on market opportunities and long-term needs of agricultural producers.

The CFPPF provides value to agri-retailers by helping to improve access to new products, promote the safety and efficacy of the fertilizers and supplements that are sold and provide insight into the future needs of customers and emerging market opportunities.

The CFPPF is conducting research on emerging market opportunities and new products, as well as an opinion survey with producers concerning their current and future fertilizer needs. This information will be available to agri-retailers to help them prepare for long-term market trends and changing needs and attitudes of their customers.

"Improvements to the regulatory system will allow products to be available on the market sooner, and agri-retailers will benefit by being able to provide a variety of new and innovative fertilizers and supplements to customers," explained Al Raine, chair of CFIA's Products Committee that provides policy input into the CFPPF. "The work of the CFPPF is important because it will help make Canada's regulatory system more streamlined, while continuing to uphold the principles of safety and efficacy for all products."

Agricultural producers will also benefit from a greater selection of innovative products on the market that suit their specific crop needs.

"Producers in Canada already spend \$2.6 billion on fertilizers and supplements per year. They require access to the best variety of products available in a timely fashion in order to succeed," said Wendy Omvlee, a representative from the Canadian Federation of Agriculture and member of the CFPPF Executive. "The CFPPF will help make the regulatory system work better for producers across the country."

Membership in the CFPPF is open and includes representation from any group, organization or individual that has a stake in the fertilizer and supplement sector. Current members include farm groups, industry that makes and sells fertilizers and supplements, and consumer and environmental groups. For more information on the CFPPF, please refer to our website at www.cfpf-fcpf.ca. ♦

Sharing Common Ground

Bulletin: New labelling requirements for packaged fertilizer

On July 12, 2007, enhanced animal health safeguards came into effect to help eliminate bovine spongiform encephalopathy (BSE), or mad cow disease, in Canada. Certain cattle tissues capable of transmitting BSE, known as specified risk material (SRM), are banned from all animal feeds, pet foods and fertilizers. Under these regulations, the Canadian Food Inspection Agency is administering new requirements for manufacturers and retailers of fertilizers and supplements.

SRM are defined as:

- the skull, brain, trigeminal ganglia (nerves attached to the brain), eyes, tonsils, spinal cord and dorsal root ganglia (nerves attached to

the spinal cord) of cattle aged 30 months or older; and

- the distal ileum (portion of the small intestine) of cattle of all ages.
- SRM in any form cannot be used in fertilizers or supplements.

Every package of fertilizer or supplement must have a lot number printed on the label. This is a new requirement for fertilizers, but was already required for supplements. Customer-formula fertilizers (most bulk farm fertilizers) are exempt from this requirement.

CFI and the retail associations are working with CFIA to ensure that all

agricultural bulk fertilizers, including fertilizers delivered in large bulk bags or totes, are exempt. Pre-packaged fertilizers will not have this exemption, just as they are not exempted from GST taxes.

Fertilizers and supplements containing certain animal proteins known as prohibited material (described in the *Health of Animals Act*) must be appropriately labelled, recorded and controlled.

Prohibited material includes products derived from most mammalian proteins, including meat and bone meal.

For details on this regulation, visit the Canadian Food Inspection Agency website at www.inspection.gc.ca. ♦



Save the Date for November 2007 CFPF Conference

The next Canadian Fertilizer Products Forum (CFPF) conference will be held in Ottawa on November 26 and 27, 2007.

The CFPF is a stakeholder-led initiative launched in November 2006 to provide consensus-based advice to government on matters relating to fertilizer, and supplement policy and regulation. Another purpose is to enhance the reputation of the industry and confidence in its products; and plan for the future by conducting research on market opportunities and long-term needs of agricultural producers.

The CFPF provides value to agri-retailers by helping to improve access to new products, promote the safety and efficacy of the fertilizers and supplements that are sold and provide insight into the future needs of customers and emerging market opportunities.

Interesting and insightful speakers, opportunities to network and a forum for discussion on how to improve regulations for fertilizers and supplements are planned for the 2007 conference.

CFPF members will present consensus-based recommendations on a variety of regulatory and policy issues they have developed over the past year. Research reports on emerging market opportunities, marketplace monitoring and product registration will also be presented for review and discussion.

This event is open to all stakeholders who are interested in improving the regulatory system for fertilizers and supplements.

We encourage your participation. For more information, please refer to the CFPF website at www.cfpf-fcpf.ca. ♦

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returns compared to an existing product. Numbers showing differences and improvements in the new product can influence consumers to purchase it. It is important that these promotional claims are accurate. Far too often just the yield averages are shown with no indication as to the actual statistical differences. Potential customers have a responsibility to ask how the study or studies were conducted and products compared.

Differences in average yields should be accompanied by some indication as to its statistical validity. For example, it could be stated that new fertilizer product "A" had an average wheat yield of 62.4 bushels per acre and commonly used product "B" yielded an average of 50.7 bushels per acre in a series of field experiments. If there is no mention as to how the yields were compared, one should be wary as to the reported improvement of product A over product B. If, however, there is mention that the confidence in the average yield difference is 95 per cent certain, this means that if repeated 100 more times, 95 out of the 100 times would probably indicate that product A will result in yields greater than product B.

Field trials can range from a very simple whole field demonstration, to simple split field comparisons, then to randomized and replicated experiments. Whole field demonstrations are used for proven technologies or products that have been tested in rigorous scientific studies. There is no need to further prove if the new product works well, and the demonstration is used to just make potential customers aware that the new product is available.

Split field designs are useful for demonstrating a new product right beside another well-known or commonly used product. This is much like the whole field demonstration and is used when there has been previous research that has conclusively shown a benefit to using the new product.

If local numbers are wanted for further comparison, multiple samples should be gathered and measured separately from each product-treated area and some basic statistics such as a t-Test should be used. At least 10 separate samples from each area are required. This was previously quite labour intensive but with the advent of yield monitors on harvesting equipment that tag a global positioning system (GPS), samples from each area can be gathered easily and a statistical comparison conducted. It is



A field research trial comparing new nitrogen fertilizer forms for use in winter wheat production, Beiseker, Alta., 2007

important that the yield monitor and attached GPS system is functioning correctly and is appropriately calibrated.

The bottom line is that if a new product is promoted as performing better than existing products there should be research results and accompanying statistical analysis available to substantiate the claims. If no such data is available there needs to be more research done.

Retailer News from the CFPF Conference

Canadian Fertilizer
Products Forum



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Fertilizer officials, agri-retailers, manufacturers and representatives from the Canadian Food Inspection Agency (CFIA) met in Ottawa to finalize recommendations that will improve timely access to fertilizer products for farmers.

The conference was hosted by the Canadian Fertilizer Products Forum (CFPF) on Nov. 26 and 27, 2007. The CFPF provides value to agri-retailers by helping to improve access to new products, promote the safety and efficacy of the fertilizers and supplements that are sold and provide insight into the future needs of customers and emerging market opportunities.

The following reports were presented at the CFPF conference:

Marketplace Monitoring and Labelling Working Group Report

Enforcement

Members of the CFPF reported that there are recurring problems with unregistered, improperly labelled, or illegally repackaged fertilizer and supplements being sold, particularly in the lawn and garden market. This could result in potentially dangerous situations for consumers and the environment, plus an uneven playing field for companies that invest in complying with CFIA standards. The Working Group recommended that the CFIA post a list of registered products on its website so retailers can verify legitimate products.

Canadian Fertilizer Quality Assurance Program (CFQAP)

The CFIA and a significant number of industry representatives acknowledge that the current Canadian Fertilizer Quality Assurance Program (CFQAP) is not achieving its goals in terms of cost-effectiveness, compliance or sampling accuracy. There is general agreement that the CFQAP needs to be revamped or replaced. CFPF members made recommendations at the conference on a new testing protocol, sampling training and calculation of tolerances.

Sharing Common Ground

George Morris Centre Research Report

The George Morris Centre presented its research findings on emerging markets and trends for the Canadian fertilizer and supplement industries. The purpose of this report was to identify and assess emerging domestic and international markets and opportunities for the Canadian fertilizer industry. As part of its research, the George Morris Centre interviewed a variety of industry experts.



Ipsos Reid Farmer Survey

Ipsos Reid presented its report based on a telephone survey representatives conducted with 400 producers across Canada on behalf of the CFPF to gain a better understanding of Canadian farmers' familiarity, usage and attitudes toward fertilizer and supplement products. According to some of the findings, farmers are generally happy with the quality of the fertilizer products they receive and plan to increase their use of compost and potash.

Please visit the CFPF website (<http://cfpf-fcpf.ca>) for full copies of these and other CFPF reports.

Interview with Anthony Parker

Anthony Parker, acting national manager of the Fertilizer Section of the Canadian Food Inspection Agency (CFIA), calls himself a career aggie. He grew up on a beef and sheep farm east of Ottawa and completed undergraduate degrees in political and environmental science at Carleton University. During his student days, he worked for Agriculture Canada's Animal Research Branch and joined the Centre after graduation and moved in 1997 to the research branch at the Eastern Cereal and Oilseed Research Centre working on corn breeding. At the same time, he worked on his master of science in agriculture (plant breeding and phytopathology). He joined CFIA's Fertilizer Section in late 2005 as an efficacy evaluator, and the next year



he became the acting chief of the Efficacy Data and Policy Unit. This past March, he moved to become national manager of the Fertilizer Section on an acting basis.

Q. What is the focus of CFIA's fertilizer activities?

A. The CFIA administers the *Fertilizers Act* and *Regulations* which requires that all fertilizers and supplements are safe for humans, plants and the environment, effective when used according to directions, and display proper label information. Most people know about the traditional agricultural NPK fertilizers that we regulate, but few realize there is a wide range of products such as compost, legume inoculants, wetting agents and liming materials that also fall under our Act. Right now we have about 25 staff across the country, including inspectors, to regulate an industry that generates over \$2.7 billion of sales in Canada.

Q. What are your biggest challenges?

A. One is certainly regulating the range of products covered under our legislation. We need the analytical methods and resources to adequately monitor these products in the market, both now, and in the future. It will become increasingly difficult for us to keep abreast of new agricultural technologies. Recently we are paying more attention to compost and bio-solid products because the number of these products will grow.

Q. What's the future for the Canadian Fertilizer Quality Assurance Program (CFQAP)?

A. The CFQAP is a voluntary sampling and analysis program to verify NPK guarantees in bulk blend fertilizers. In the past few years there's been a gradual drop off of participation in this program, especially in Western Canada while there is still some desire for the program in Central and Eastern Canada. The Canadian Association of Agri-Retailers, the Canadian Fertilizer Institute and other interested stakeholders are in the process of drafting recommendations to revive and improve the program. The CFIA is very encouraged by industry leadership in fixing the CFQAP problems.

Q. Is there an implication for CFIA if the CFQAP was abandoned?

A. We would have to assume a significantly larger role in monitoring. Instead of the 1,200 to 1,400 samples we do annually for bulk blends, we would be looking at (handling) at least 3,000 samples. It would mean a lot more resource pressure on us.

Q. What was your reaction to the Ipsos Reid survey on farmer attitudes to fertilizer regulation?

A. I was pleased with the results; it shows public confidence in the system and CFIA's role in regulating the sector. However, there is always room for improvement. We noted that farmers were aware of products being used elsewhere that are not available in Canada. We are aware that some companies actually avoid the Canadian market altogether due to the lengthy registration process. This is certainly not the level of service we want to deliver. We are committed to getting the resources needed to do our job well. ♦

APPENDIX E – MEMBER UPDATE (SAMPLE)

Canadian Fertilizer
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Canadian Fertilizer Products Forum Member Update – January 2008

November Forum Details on Web Site

The CFPPF Forum was held in Ottawa on November 26 & 27. With more than 90 people in attendance, the two day event was filled with discussions, presentations, and dialogue on many issues of importance to the industry. The Forum approved the five working group reports, appointed new Executives during the AGM, and held discussions on a Path Forward for the CFPPF given funding is soon to expire.

To view the Forum presentations and to read the Forum report, go to the CFPPF web site and look under the **What's New** section: <http://cfpf-fcpf.ca/default.asp>

CFPPF Executive

During the Annual General Meeting, CFPPF members confirmed the following members to the Executive:

Susan Antler, John Bumbac, Brian Gilbertson, Geoff Giles, Paul Lefevbre, Mike Leslie, Peter McCann, Wendy Omvlee, Richard Phillips, Darrin Qualman, Adrian Toth

Working Group Reports Finalized

During the Forum, participants approved the five working group reports. These reports are now being translated and will be available soon on the CFPPF website. The interim reports are posted on the CFPPF website.

CFPPF Action to Reduce Registration Backlog

During the Forum, members passed a Special Motion calling for a greater resourcing commitment to the CFIA to reduce the registration backlog.

If your organization has sent a letter to the CFIA President requesting such support, please send copies of the letter as well as the response received from the President's office to Peter McCann at p.mccann@sympatico.ca

Path Forward for CFPPF

The funding for the CFPF is soon to run out. During the Forum there was a general willingness to keep CFPF going. It was agreed that Peter McCann and the CFPF Executive will spearhead an initiative to obtain funding for a permanent consultative body on fertilizer. This effort will consider the potential to partner with the National Forum on Seed. In the interim, the Canadian Fertilizer Institute has agreed to provide for minimum maintenance of the web site, an occasional Executive conference call, and organizing a conference for November 2008.

If you have any suggestions on the future structure of the CFPF, please send your comments to Peter McCann at [**p.mccann@sympatico.ca**](mailto:p.mccann@sympatico.ca)

Future CFPF Meetings

There are three future CFPF meetings planned:

Regulatory Efficiency Working Group - February 5, 2008 at 2pm EST

Executive Committee - February 11, 2008 at 3pm EST

Biosolids Products Working Group – February 14, 2008 at 11am EST

APPENDIX F – CFPF AGENDA FORMAT (SAMPLE)

Canadian Fertilizer Products Forum

Marketplace Monitoring & Labelling Work Group

March 28, 2007, 9:00 a.m. EDT

Albert at Bay Suite Hotel

Ottawa, Ontario

AGENDA

Item No.	Timing	Agenda Item	Presenter	Action Requested
1	9:00-9:10	Call to order and introductions	Paul Lefebvre	
2	9:10 – 10:00	How to improve enforcement	Paul Lefebvre/ Robynne Anderson	Identify specific action items
3	10:00-10:45	Discuss ideas for QA on supplements, micronutrients: possible exemption due to registration and re-registration processes.	Paul Lefebvre	
4	10:45-10:55	Labelling sub-committee report	Paul Lefebvre	
5	10:55-11:05	CFQAP sub-committee report	Paul Lefebvre	
6	11:05-11:15	Meeting Highlights	Paul Lefebvre	Identify three highlights to share with Executive Committee of CFPF
7	11:15-11:25	Other Issues	Paul Lefebvre	
8	11:25-11:30	Next meeting and adjourn	Paul Lefebvre	

To participate in the conference call please dial the numbers below:

Participant call-in number: 1-416-507-1717

Participant passcode: **0148#**

APPENDIX G – SUMMARY OF RECOMMENDATIONS

CFPF WORKING GROUP (WG) SUMMARY OF RECOMMENDATIONS / OUTCOMES March 7, 2008

ISSUE	WORKING GROUP	RECOMMENDATION	STATUS (approved/ proposed/ rejected/ postponed)	ADDITIONAL NOTES
Efficacy	Efficacy Task Force	Efficacy Recommendations Number of Trials and Standards of Significance	Approved	Response received from CFIA with changes expected this calendar year.
Efficacy	Efficacy Task Force	Triggering Efficacy	Approved	Approved at CFPF Forum Nov 2007
Efficacy	Efficacy Task Force	Requirements for greenhouse or growth chamber data for fertilizer registrations	Approved	Approved at CFPF Forum Nov 2007
Efficacy	Efficacy Task Force	Recommendations for Efficacy Guidelines for Registering Micronutrients	Approved	Approved at CFPF Forum Nov 2007
Efficacy	Efficacy Task Force	Work of the Task Force has wrapped up. The Task Force agreed to be available upon the call of the chair to act as an advisor to the CFIA on issues relevant to the work of the Task Force.		At the last meeting, it was agreed that the work of the Task Force would wrap up with no future meetings. Work of the New Products Work Group would resume in its place.
Efficacy	REWG	Applications tracking system implementation	Approved	Included under 10.2 of the CFIA SAP
Efficacy	REWG	Baseline study of economic impacts of current regulatory framework on each segment of fertilizers & supplements industry	Approved	George Morris study to include economic impacts on both the macro and micro fertilizers, as well as supplements.
Efficacy	REWG	REWG expressed several items of concern in 2 May 2007 memo to Executive for consideration by CFIA.	Approved	Forwarded to CFIA for consideration
Efficacy	REWG	Informal proposal to create a partial exemption list.	Proposed	REWG is awaiting commentary from CFIA prior to developing a formal recommendation.
Efficacy	REWG	Applications tracking system implementation	Approved	Included under 10.2 of the CFIA SAP
Labelling	Labelling Committee/MML	Recommendations on Schedule IIA definitions	Approved	The committee has reached consensus on many definitions. Consensus was not reached on a few definitions including slow/controlled release fertilizers. In these instances, two options for definitions were presented for consideration by the CFIA.
Labelling	MML	Recommendations on Labelling Fertilizer Products	Approved	Approved at CFPF Forum Nov 2007
Labelling	MML	Pre-consultation on the Fertilizer Guidelines	Proposed at November Forum	The working group proposed that the committee act as a pre-consultative body prior to the release of the newly designed Fertilizer Guidelines
Quality Assurance /Marketplace monitoring	CFQAP Sub-committee/MML	Recommendations on sampling procedures	Approved	Approved at CFPF Forum Nov 2007
Quality Assurance /Marketplace	CFQAP Sub-committee/MML	Education programming. Does industry need to spearhead an	Approved	Approved at CFPF Forum Nov 2007

monitoring		education program on proper sampling?		
Quality Assurance /Marketplace monitoring	CFQAP Sub-committee/MML	Testing Protocols, soluble versus total extraction	Approved	Approved at CFPF Forum Nov 2007
Quality Assurance /Marketplace monitoring	CFQAP Sub-committee/MML	Tolerance levels for NP&K	Approved	Approved at CFPF Forum Nov 2007
Quality Assurance /Marketplace monitoring	CFQAP Sub-committee/MML	Path Forward for CFQAP – Two Potential Paths	Approved	Approved at CFPF Forum Nov 2007
Quality Assurance	REWG	Review of T-4-103	Approved	A letter has been sent to CFIA. It was agreed to dissolve the ad hoc sub-committee.
Quality Assurance	REWG	MFAC position paper on data requirements for registration	Proposed	REWG to provide feedback to CFIA after current season. MFAC finalized their paper and have submitted to CFPF Executive seeking endorsement and conveyance to CFIA.
Quality Assurance	BWG	A cross-Canada checkup to determine provincial registration and regulation requirements concerning biosolids and biosolids based products.	In progress	Sub-group to report back to full BWG, then forwarded to CFPF for their consideration.
Quality Assurance		'Waste vs. Product' sub-group to prepare a brief synopsis outlining the 'Waste vs. Product' issue in Ontario.	Proposed	Discussion paper submitted as final
Marketplace Monitoring	MML	Options for an industry-based monitoring program	Rejected by committee	The committee agreed to suspend discussion on an industry monitoring program, electing to focus on the issue of enforcement.
Enforcement	MML	Recommendations for Addressing Unregistered Fertilizer and Supplement Products in Canada/Enforcement	Approved	Article distributed to media. Trade show list and top 3 recommendations for attendance by CFIA presented. CFIA response received noting that some changes were not possible in this coming year. November Forum the working group encouraged the CFIA focus the largest percentage of their enforcement efforts on the 20% of the industry that is not complying with the regulations.
Communications	COEWG	Branding CFPF (logo, slogan, etc)	Approved	Finalized in Apr.2007
Communications	COEWG	Key messages of CFPF	Approved	Finalized in May 2007
Communications	COEWG	Website	Approved	Website operational in May 2007
Communications	COEWG	3 introductory publications	Approved	Publications finalized in June 2007
Communications	COEWG	Letter to federal and provincial agriculture ministers	Approved	Sent in July 2007
Communications	COEWG	Letter to Canadian Federation of Agriculture, Grain Growers of Canada, Alberta Barley Commission, National Farmer's Union, Christian Farmers Federation of Ontario and Pulse Growers (Alberta, Manitoba & Sask.) RE Ipsos Reid survey results	Approved	Letter sent in Oct. 2007
Communications	COEWG	Ipsos Reid media launch (with news release & backgrounder)	Approved	Distributed to media Oct.3, 2007
Communications	BWG	Review of definitions for biosolids and biosolids based products	Proposed	Two definitions presented in final report of BPWG.
Communications	REWG	Proposed that CFIA develop regulatory training for members' staff.	Postponed	E-learning tools being developed for fertilizer and labeling requirements. Training package for submissions and other regulated

Communications	Forum Plenary	The November 2007 Forum passed a Special Motion to address the resourcing shortage at the CFIA Fertilizer Section.	Passed by Forum members	processes to be reconsidered after the bulk of the registration and regulation guides have been revised, as per the CFIA SAP. Several organizations have sent a letter to the President of the CFIA and a response has been received stating that the CFIA is working to address the shortage
Administration and Future of the Forum	Forum Plenary	<p>Path Forward for CFPF</p> <ul style="list-style-type: none"> • CFPF Executive will spearhead an initiative for funding a permanent consultative body for fertilizer, including consideration for partnering with the National Forum on Seed. • In the interim, CFI will provide for minimum maintenance of the web site, and an occasional Executive conference 	Approved	During the National Forum in November, participants expressed a There is a willingness to keep CFPF going call, and organizing a conference for November 2008.
Working Group Reports	All WG	Approval of CFPF Working Group Reports during CFPF National meeting in November	Strong support from National Forum	Members of the CFPF have expressed strong support for the work and recommendations of the five working groups.